



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

File *Steve*

**CERTIFIED MAIL**

March 31, 1991

RE: Columbus Coated Fab TA2 LOW  
OHIO ID: 01-25-0145  
USEPA ID: OHD 004 294 351

Mr. Thomas Grover  
Columbus Coated Fabrics  
P.O. Box 208  
Columbus, Ohio 43216  
Dear Mr. Grover:

On September 21, 1990, the Ohio EPA transmitted to you a Notice of Deficiency (NOD) letter pursuant to a first round technical adequacy review of the Columbus Coated Fabrics Part B application. A response to the extensive comments of this NOD, dated November 21, 1990, was received by the Ohio EPA on November 26, 1990.

Although Columbus Coated Fabrics' response failed to follow the protocol specified in the September 21, 1990 NOD for submission of revised information, the Ohio EPA Division of Solid and Hazardous Waste Management has conducted a completeness/technical adequacy review of your Part B application taking into account the November 21, 1990 response and has determined it to be incomplete and inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapters in the Ohio Administrative Code and the corresponding Federal regulations.

The comments resulting from this most recent review are again extensive. In fact, many of these reflect that Columbus Coated Fabrics' November 21, 1990 NOD response had either insufficiently addressed previous comments or failed to respond altogether. Furthermore, technical inconsistencies (i.e. lack of proof reading, illegibility, wrong pages referenced, pages non-sequentially numbered, etc.) found throughout the application bring question to Columbus Coated Fabrics commitment to producing an adequate document. As a result of the above, the Ohio EPA must provide notice that failure to correct deficiencies in the application is a violation of OAC 3745-50-40(I) and may result in 1) the assessment of a civil penalty against the applicant, 2) revocation of any existing permit; 3) denial of the application for renewal permit; or 4) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action.



Mr. Thomas Grover  
Page Three

However, if all comments are not adequately addressed or a closure plan is not forthcoming by the due date required in this NOD, I will proceed to provide the Director with a recommendation on initiating a formal enforcement action in this matter.

The Ohio EPA now requests that the facility contact Andy Kubalak, of the Central District Office at (614) 771-7505 to make your intentions in pursuing a Part B permit for this facility known, and to discuss each of the enclosed comments in order to make clear the information being requested and the level of detail expected. This can best be accomplished through a conference call or meeting.

Sincerely,



Linda Welch, Chief  
Division of Solid and Hazardous Waste Management

Enclosure

cc: President, Borden Inc.  
James C. Weaver, Director of Manufacturing, CCF  
Lisa Pierard, U.S. EPA  
Joel Morbito, U.S. EPA  
Ed Lim, CO, DSHWM, Ohio EPA  
Pam Allen, Manager, DSHWM, Ohio EPA  
Tehmton Toorkey, CO, DSHWM, Ohio EPA  
Frank Basting, CO, DSHWM, Ohio EPA  
Andy Kubalak, CDO, DSHWM, Ohio EPA  
Central File

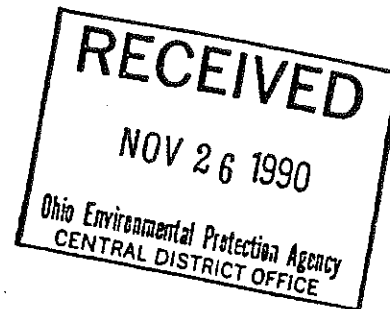
K  
**COLUMBUS COATED FABRICS**

Division of  
BORDEN CHEMICAL, BORDEN INC.



November 21, 1990

Mr. Tom Crepeau  
Ohio EPA, DSHWM  
1800 WaterMark Drive  
P. O. Box 1049  
Columbus, Ohio 43266-0149



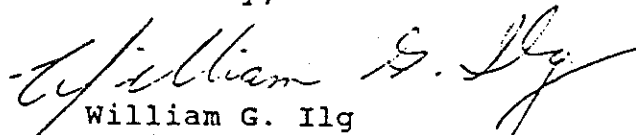
RE: Col. Coated Fab.  
Re# OHD004294351  
Ohio 01-24-0145

Dear Mr. Crepeau:

Enclosed is the completed Columbus Coated Fabrics' Part B Application in accordance with the request of September 21, 1990.

Please be advised that the Independent Structural Engineer's Evaluation of the Hazardous Waste Concrete Pad and all related calculations will follow shortly.

Sincerely,

  
William G. Ilg  
Environmental Coordinator  
COLUMBUS COATED FABRICS  
Division of Borden Chemical  
Borden, Inc.

Enclosure

cc: Andy Kubalak, Central District Office  
Lisa Pierard, RCRA Activities  
RCP, Inc.  
All With Enclosure

<b>FORM 1</b> <b>GENERAL</b>		<b>EPA</b>		U.S. ENVIRONMENTAL PROTECTION AGENCY <b>GENERAL INFORMATION</b> <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>		EPA I.D. NUMBER F			
<b>II. POLLUTANT CHARACTERISTICS</b>		PLEASE PLACE LABEL IN THIS SPACE		<b>GENERAL INSTRUCTIONS</b> If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.					
<b>INSTRUCTIONS:</b> Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.									
<b>SPECIFIC QUESTIONS</b>				<b>MARK "X"</b> YES NO FORM ATTACHED		<b>SPECIFIC QUESTIONS</b>		<b>MARK "X"</b> YES NO FORM ATTACHED	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)				YES NO FORM ATTACHED X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		YES NO FORM ATTACHED X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)				YES NO FORM ATTACHED X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		YES NO FORM ATTACHED X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		YES NO FORM ATTACHED X		F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		YES NO FORM ATTACHED X			
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		YES NO FORM ATTACHED X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		YES NO FORM ATTACHED X			
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		YES NO FORM ATTACHED X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		YES NO FORM ATTACHED X			
<b>III. NAME OF FACILITY</b> 1 SKIP COLUMBUS COATED FABRICS									
<b>IV. FACILITY CONTACT</b> A. NAME & TITLE (last, first, & title) 2 THOMAS B GROVER ENV MGR B. PHONE (area code & no.) 6 14 2 97 6 097									
<b>V. FACILITY MAILING ADDRESS</b> A. STREET OR P.O. BOX 3 P O BOX 208 B. CITY OR TOWN 4 COLUMBUS C. STATE OH D. ZIP CODE 43216									
<b>VI. FACILITY LOCATION</b> A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 5 1280 NORTH GRANT AVENUE B. COUNTY NAME FRANKLIN C. CITY OR TOWN 6 COLUMBUS D. STATE OH E. ZIP CODE 43216 F. COUNTY CODE (if known) 25									

## VII. SIC CODES (4-digit, in order of priority)

A. FIRST

B. SECOND

7 2 2 9 5 (specify)  
Coated Fabrics, Not Rubberized7 2 7 9 6 (specify)  
Rotogravure Engravers

C. THIRD

D. FOURTH

(specify)

(specify)

## VIII. OPERATOR INFORMATION

A. NAME

BORDEN INC

B. Is the name listed in Item VIII-A also the owner?

☒ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

D. PHONE (area code &amp; no.)

F - FEDERAL  
S - STATE  
P - PRIVATEM - PUBLIC (other than federal or state)  
O - OTHER (specify)

P

(specify)

Private

A

6 1 4

2 2 5

4 0 0 0

E. STREET OR P.O. BOX

180 EAST BROAD STREET

F. CITY OR TOWN

COLUMBUS

G. STATE

H. ZIP CODE

OH

4 3 2 1 5

IX. INDIAN LAND

Is the facility located on Indian lands?

☐ YES ☒ NO

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)

D. PSD (Air Emissions from Proposed Sources)

9 N

9 P

B. UIC (Underground Injection of Fluids)

E. OTHER (specify)

9 U

9 M

ISC

(specify)

State Permits

C. RCRA (Hazardous Wastes)

E. OTHER (specify)

9 R 0 HD 004 294 351

9

(specify)

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of Coated Fabrics

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME &amp; OFFICIAL TITLE (type or print)

B. SIGNATURE

C. DATE SIGNED

JAMES C. WEAVER

DIRECTOR OF MANUFACTURING

James C. Weaver

11-20-90

COMMENTS FOR OFFICIAL USE ONLY



U.S. ENVIRONMENTAL PROTECTION AGENCY  
**HAZARDOUS WASTE PERMIT APPLICATION**  
Consolidated Permits Program  
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

10 HD 004 294351

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITY PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☒ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	501	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	502	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	503	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
SURFACE IMPOUNDMENT	504	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
<b>Disposal:</b>			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	H
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C		DUP		1					
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	450 Drums	G		7				
2					8				
3					9				
4					10				

### III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Line #1 Solvent recovery is a two stage operation. In the first stage, solvent is removed from scrap ink. In the second stage, water introduced by the first operation is removed from the solvent.

Line #2 Plating discharge treated to precipitate chrome and copper which is then removed in throw away filters.

### IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

##### 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

[illegible]

## IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

01HD00429435116

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, &amp; seconds)

LONGITUDE (degrees, minutes, &amp; seconds)

39 59 02 3

082 59 043

## VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

E

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F G

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

JAMES C. WEAVER

James C. Weaver

11-20-90

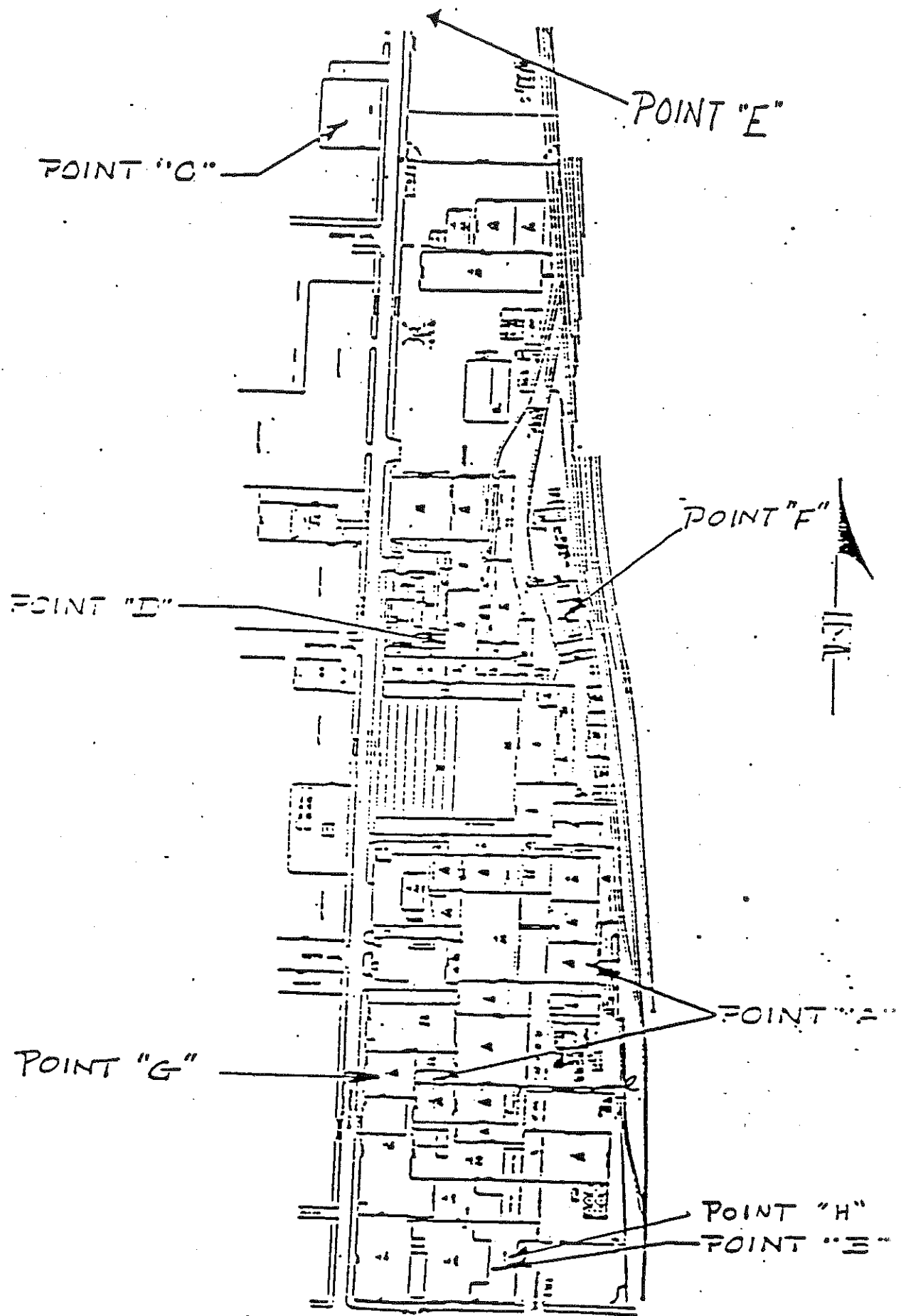
## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED



## COLUMBUS COATED FABRICS

## PERMITS

Sorted by EPA #

-01 25 04 0031-

EPA #	COMPANY ID	DESCRIPTION	ISSUED	COMMENTS*
B001	Boiler #1(62 MMBTU Derate)	Coal Fired Boiler	08/06/86	
1002	Boiler #1(62 MMBTU Derate)	Coal Fired Boiler	08/06/86	
B003	Boiler - 7.5 MMBTU Gas/Oil		11/17/78	
B004	Boiler - 7.5 MMBTU Gas/Oil		10/18/85	
K002	HL-40	Gravure Printer	11/02/83	1
K006	DN-14	NBC Line	11/02/83	1
K008	DF-41 w/Incinerator	Roll Coater	11/02/83	1
K010	FY-10	Inlay Embosser	11/02/83	1
K011	FY-12	Inlay Embosser	11/02/83	1
K012	HS-32 w/Incinerator	Gravure Printer	11/02/83	1
K013	HS-33 w/Incinerator	Gravure Printer	11/02/83	1
K014	DP-21, DL-21	Laminator	11/02/83	1
K015	HI-41	Gravure Printer	11/02/83	1
K016	HF-4	Gravure Printer	05/21/85	2
K019	HF-12	Gravure Printer	05/21/85	2
K020	HM-30	Gravure Printer	05/21/85	2
K021	HM-31	Gravure Printer	05/21/85	2
K022	HM-35	Gravure Printer	05/21/85	2
K023	HM-36	Gravure Printer	05/21/85	2
K024	HM-37	Gravure Printer	05/21/85	2
K025	HM-38	Gravure Printer	05/21/85	2
K026	HM-39	Gravure Printer	05/21/85	2
K027	Silk Screening	Design Lab Unit	10/29/82	
K028	PC-5 Calender/Laminator	Plastic Calendering	10/29/82	
K030	DL-24	Laminator	04/11/86	
K031	DL-25	Adhesive Laminator/ Reverse Roll	04/11/86	
K032	DL-26	Adhesive Laminator/ Reverse Roll	04/11/86	
K034	DR-24	Plastic Coater (Vinyl)	04/11/86	
K035	FK-1	Flocker (Vinyl-Adhesive/Ink)	04/11/86	
K036	SA-19	Paper, Cloth and Vinyl Coating Machine	04/18/86	
K037	BN-4	Fabric Coating Line	04/11/86	
P010	U-135 Mixer w/Baghouse	Moorehouse-Cowles Mixer	09/25/81	3
P012	U-137 Mixer w/Baghouse	Moorehouse-Cowles Mixer	10/02/81	4
P013	U-138 Mixer w/Baghouse	Moorehouse-Cowles Mixer	10/02/81	4
P014	U-139 Mixer w/Baghouse	Moorehouse-Cowles Mixer	10/09/81	4

- \* 1 - Variance Issued/USEPA must approve  
 2 - Modified Variance/USEPA must approve  
 3 - CCF applied 5/23/84 - need update  
 4 - CCF applied 6/19/84 - need update

COLUMBUS COATED FABRICS  
PERMITS (cont.)  
Sorted by EPA #  
-01 25 04 0031-

EPA #	COMPANY ID	DESCRIPTION	ISSUED	COMMENTS**
P015	PC-2	Plastic Calender	Plastic Calendering	10/09/81 4
P016	PC-3	Plastic Calender	Plastic Calendering	10/20/81 4
P017	PC-4	Plastic Calender	Plastic Calendering	10/20/81 4
P018	PC-6	Plastic Calender	Plastic Calendering	10/30/81 4
P023	CP-2, 21, 22, 23, 24 & 29	Plating Tanks	12/18/81	
P039	FR-11,	Embossing	Embossing Machine	06/24/83
P040	FL-17,	Embossing	Embossing Machine	06/24/83
P041	FL-18,	Embossing	Embossing Machine	06/24/83
P042	FL-01,	Embossing	Embossing Machine	06/24/83
P043	FL-11,	Embossing	Embossing Machine	06/24/83
P044	FL-13,	Embossing	Embossing Machine	06/24/83
P045	FL-14,	Embossing	Embossing Machine	07/08/83
P046	FL-15,	Embossing	Embossing Machine	07/08/83
P049	FR-12,	Embossing	Embossing Machine	07/22/83
P100	Bulk Handling System	Pneumatic Conveyor w/6 Bins/Tanks	07/09/88	

- \* 1 - Variance Issued/USEPA must approve  
 2 - Modified Variance/USEPA must approve  
 3 - CCF applied 5/23/84 - need update  
 4 - CCF applied 6/19/84 - need update



State of Ohio Environmental Protection Agency

Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020 Fax (614) 644-2329

RECEIVED

SEP 26 1990

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Richard F. Celeste  
Governor

Steve  
Firehatch  
B  
Buck

CERTIFIED MAIL

SEP 21 1990

RE: Col. Coated Fab.  
Re# OHD004294351  
OHIO 01-25-0145

William G. Ilg  
Columbus Coated Fabrics  
1280 North Grant Ave.  
P.O. Box 208  
Columbus, Ohio 43216

Dear Mr. Ilg:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility pursuant to both the State and Federal Part B call-in.

As you may know, Ohio has been delegated authorization to operate its hazardous waste management program in lieu of the Federal hazardous waste program. Ohio now has the responsibility for issuing Resource Conservation and Recovery Act (RCRA) permits for hazardous waste treatment, storage and disposal facilities subject to the authority retained by U.S. EPA under the Hazardous and Solid Waste Amendments of 1984 (HSWA) to RCRA. Since the requirements and prohibitions imposed by HSWA are effective immediately, regardless of a State's authorization status, U.S. EPA will continue to implement the applicable HSWA requirements. In other words, under HSWA there will continue to be a dual State/Federal regulatory program in Ohio. To the extent Ohio's authorized program is unaffected by HSWA, the Ohio program will operate in lieu of the Federal program. To the extent HSWA-related requirements are in effect, U.S. EPA will continue to administer and enforce those portions of HSWA (which may include the issuance of full or partial permits) until Ohio receives authorization. Until that time, Ohio will continue to assist U.S. EPA's implementation of the HSWA requirements under a cooperative agreement.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a completeness/technical adequacy review of your Part B application and has determined it to be inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapter in the Ohio Administrative Code and pursuant to the corresponding Federal regulations.

We have enclosed both completeness and technical adequacy comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to Ohio EPA within 55 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck.
2. New language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau  
Ohio EPA, DSHWM  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43266-0149

Andy Kubalak  
Central District Office  
2305 Westbrooke Dr., Building C.  
P.O. Box 2198  
Columbus, Ohio 43228

Lisa Pierard  
RCRA Activities  
Part B Application  
U.S. EPA - Region V  
Chicago, Illinois 60690-3587

In the course of the technical adequacy review, we may request additional information if it is necessary to clarify, modify, or supplement previous submissions of information in order to substantively evaluate the permit application for adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in (1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, (2) denial of the application for renewal permit, or (3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action.

If you have any questions concerning the review of the permit application, or the level of detail expected, please do not hesitate to contact Andy Kubalak at (614) 771-7505. We also recommend that the facility contact the above referenced person, and discuss each of the enclosed comments in order to make clear the information being requested. This can be accomplished by a conference call or meeting.

Finally, as you may know, Ohio's hazardous waste law was recently amended to authorize the Attorney General to conduct background investigations on permittees and permit applicants for hazardous waste treatment, storage and disposal facilities. Ohio Revised Code 3734.42 requires every applicant to file a disclosure statement with both the Ohio EPA and the Attorney General on a form developed by the Attorney General.

Rules 109:6-1-01 to 109:6-1-04 were promulgated by the Attorney General to implement the background investigations program. These rules, effective March 3, 1989, provide that if a permit application is filed on or after 180 days of the effective date of the rules, i.e., after September 3, 1989, then the application for a permit must be accompanied by the required disclosure statement.

Since you have filed a permit application before September 3, 1989, then your disclosure statement shall be filed with the Attorney General on or before the date specified in a written notice to be sent by the Attorney General in accordance with Ohio revised code 3734.42.

For information concerning Rules 109:6-1-01 to 109:6-1-04, the disclosure statements, and the Attorney General's procedures for written notice, please contact Mr. Athan Vinolus at the Attorney General's Environmental Enforcement Section, 30 East Broad Street, Columbus, Ohio 43215 or at (614) 466-2766.

Ohio EPA will continue to process your application without a disclosure statement. The permit application and the findings made in accordance with Ohio Revised Code 3734.05(H)(1) and 3734.44 will form the basis for Ohio EPA's determination on the permit. An investigative report will be developed by the Attorney General and evaluated for the permit. Please be advised that future review of the disclosure statement and investigative report developed for this permit may form the basis for revocation of the permit, where applicable, pursuant to Ohio Revised Code 3734.45.

Sincerely,



Edwin Y. Lim, Manager  
Engineering Section  
Division of Solid and Hazardous Waste Management

EYL/fjb

cc: Lisa Pierard, U.S. EPA  
Joel Morbito, U.S. EPA  
Frank J. Basting, CO, DSHWM, Ohio EPA  
Andy Kubalak, CDO, DSHWM, Ohio EPA  
Central File

PART B REVIEW COMMENTS

COLUMBUS COATED FABRICS  
OHD004294351/01-25-0145

COMPLETENESS COMMENTS

A. PART A APPLICATION

C-1, [OAC 3745-50-43(A) (6)]

The process design capacity and the process code on Page 1 of 5 and Page 3 of 5 are incorrectly stated as 501.

C-2, [OAC 3745-50-41(D) (5) (a)]

The Part A Application fails to indicate that a Federal Part B Permit has been issued to the facility.

C-3, [OAC 3745-50-41(D) (6)]

The map titled "Borden Chemical Company CCF" extending one mile beyond property boundaries does not have an orientation, a map scale, or a date. This map shall be a topographic map.

C-4, [OAC 3745-50-41(D) (6)]

The map titled Columbus Coated Fabrics Corporation General Map does not indicate the presence of the three wells which are located at the facility. This map shall also indicate the presence of any wells or drinking water wells or springs within one quarter mile of the facility boundary.

C-5 [OAC 3745-50-41(D) (6)]

The two maps, referenced in deficiencies 3 and 4 above, shall be combined. One topographic map shall be submitted.

B. TRAFFIC INFORMATION

C-6, [OAC 3745-50-44(A) (10)]

The application indicates that only three trucks use the internal roadway and Gate No. 5 during any one day. Indicate if any other vehicles use this internal roadway and Gate No. 5 (such as delivery vehicles, work or personal vehicles). If so, describe the types of vehicles and provide an approximate number of vehicles.

C. WASTE CHARACTERISTICS

C-7, C-1 - Chemical and Physical Analyses [OAC 3745-54-13]

Section B, Page 2 indicates that the corrosive hazardous wastes generated in the plating and engraving departments are accumulated less than 90 days.

The application provides analytical data and describes corrosive hazardous wastes which are generated at the plating and engraving departments (such as ferric chloride and hydrochloric acid). Why have corrosive hazardous wastes generated in these departments been addressed in the permit application, if they will not be stored in the proposed hazardous waste storage building? Clarify this discrepancy.

C-8, C-1 - Chemical and Physical Analyses [OAC 3745-54-13]

The application provides analytical data for the following waste streams, but fails to adequately describe how the hazardous constituent was used in the process, fails to note the location where each waste will be managed (accumulated or stored), fails to provide all of the hazardous waste code numbers for each waste and fails to describe each of the hazard characteristics indicated by the analytical results found in the application:

- |                         |                                |
|-------------------------|--------------------------------|
| - plating pit sludge    | - used hydrochloric acid       |
| - pan wash tank waste   | - used xylene based derivative |
| - DN-14 solid           | - used zinc chloride           |
| - DN-14 liquid          | - waste oil absorbent material |
| - chromic sludge        | - rags with copper sulfate     |
| - used ferric chloride  | - waste filter bags            |
| - used monoethanolamine |                                |

The basis for hazard designation for each of the waste streams can be understood when specific descriptions of the process generating the waste and the role of the hazardous constituents are provided. A description, as provided, of the location where the waste is generated is insufficient in itself.

C-9, C-1 - Chemical and Physical Analyses [OAC 3745-54-13]

Section 2, Page 2 indicates that chromic sludge is E.P. Toxic for chromium and lead and probably corrosive. Analytical results in Section 2, Page 22 do not indicate that the chromic sludge is a D002 waste. Will this waste stream be classified as a D002 waste? Is this waste stream proposed to be stored? If so, revise the Part A to reflect the appropriate waste codes.

C-10, C-1 - Chemical and Physical Analyses [OAC 3745-54-13]

Section 2, Page 2a indicates that monoethanolamine is E.P. toxic. Analytical results in Section 2, Page 15 do not indicate that this waste stream is E.P. Toxic. These results indicate ignitability. Is this waste stream proposed to be stored? If so, revise the Part A to reflect the appropriate waste codes.

C-11, C-1 - Chemical and Physical Analyses [OAC 3745-54-13]

The application provides analytical data indicating that some of the waste streams would be assigned more than one waste code number, specifically, D001, D007, D008 and D010. Are the hazardous waste streams with these waste code numbers proposed to be stored? If so, revise the Part A.

C-12, C-1 - Chemical and Physical Analyses [OAC 3745-54-13]

It is unclear, following our review of the hazardous waste analysis section and the waste analysis plan if analytical data have been provided for the following waste codes on the Part A: F002, F003, F005, P029, P098. Clarify this discrepancy.

C-13, C-1 - Chemical and Physical Analyses [OAC 3745-54-13]

Section 2, Page 2 indicates that waste analysis are found on Pages 4-11 of this section. These analysis are found on Pages 4-24. Correct this discrepancy.

C-14, C-1 - Chemical and Physical Analyses [OAC 3745-54-13]

The units for analytical results which have been provided in Section 2, Pages 10-11 are illegible. Legible copies shall be submitted.

It is recommended that the application fully describe and discuss each individual hazardous waste stream prior to describing other hazardous waste streams. (This would include the waste stream, the process generating the waste and how the hazardous constituent is used in the process, location where the waste will be managed (accumulated or stored) hazardous waste codes for each waste stream and all physical and analytical data). Currently, the application addresses some of these requirements in various locations of the application.

C-15, C-2a - Parameters and Rationale [OAC 3745-54-13(B)(1)]

Section 3, Table 1. The right side of this page has been cut off. Correct this deficiency.

C-16, C-2a - Parameters and Rationale [OAC 3745-54-13(B)(1)]

Section 3, Table 1. This table refers to electroplating sludge when throughout the application you have described chromic sludge. Are these waste streams one and the same? If so, please be consistent. If these waste streams are different, then address the electroplating sludge in the waste analysis plan and in the hazardous waste analysis sections of the application.

C-17, C-2a - Parameters and Rationale [OAC 3745-54-13(B) (1)]

Section 3, Table 1 does not include all of the waste streams for which analysis have been provided. (Such as the limestone sump plating residue or oil absorbent material). If these hazardous waste streams are proposed to be stored, revise Table 1 to include all hazardous wastes.

C-18, C-2a - Parameters and Rationale [OAC 3745-54-13(B) (1)]

Table 1 includes hazardous waste streams which have not been previously addressed in the application (such as cyclohexanone, methylene chloride and 1,1,1-trichloroethane). If these hazardous waste streams are proposed to be stored, then address these hazardous wastes in the waste analysis plan and in the hazardous waste analysis sections of the application.

C-19, C-2a - Parameters and Rationale [OAC 3745-54-13(B) (1)]

The rational for the list of parameters chosen to store the waste in accordance with Ohio regulations shall be described.

C-20, C-2b - Test Methods [OAC 3745-54-13(B) (2)]

The waste analysis plan fails to specify analytical test methods for hazardous waste streams. The application shall include the specific analytical test method for each parameter for each waste stream proposed to be stored. Test methods shall be referenced.

C-21, C-2c - Sampling Methods [OAC 3745-54-13(B) (3)]

The application fails to include the specific sampling method for each of the waste streams proposed to be stored.

C-22, C-2c - Sampling Methods [OAC 3745-54-13(B) (3)]

Section 3, Page 1 indicates that sampling procedures for Dust Stop Wastes, Dust Stop Oil and Electroplating Waste are described on Pages 6, 7, 8, 9, 10 and 11. Pages 6, 7 and 8 do not provide these descriptions. The waste analysis plan does not contain Pages 9, 10 or 11. Correct this discrepancy.

C-23, C-2f - Additional Requirements for Ignitable, Reactive or Incompatible Wastes [OAC 3745-54-13(B) (6)]

Section 3, Page 6 indicates that an independent lab will evaluate samples for reactivity in accordance with SW-846. Sample results for reactivity for hazardous waste streams proposed to be stored shall be provided.

C-24, C-2f - Additional Requirements for Ignitable, Reactive or Incompatible Wastes [OAC 3745-54-13(B)(6)]

Section 3, Page 7 indicates that incompatible wastes are generated. Indicate which hazardous wastes are incompatible. Indicate how this determination was made and include any analytical data used to make this determination.

C-25, C-3a - Waste Characterization [OAC 3745-59-07(A)]

Section 3, Pages 7 and 8 indicate that analyses are periodically obtained to verify that concentrations are met which meet land ban restrictions. Clarify what is meant by this statement. Define periodically.

Indicate how it will be determined if the restricted waste meets or exceeds the treatment standards. Include all waste analyses used to make this determination.

C-26, C-3a(2) - Waste Characteristics: California List Wastes [OAC 3745-59-32]

The application shall indicate if California List Wastes are generated. Indicate how this determination was made and provide any analytical data used to make this determination. If so, the application shall indicate that these wastes will not be land disposed.

C-27, C-3a(3) - Waste Characteristics: First Third Wastes With Treatment Standards [OAC 3745-59-41]

The Part A indicates proposed storage of F006, a first third restricted waste with treatment standards. The waste analysis plan shall indicate if this waste stream exceeds the applicable treatment standards. Indicate how this determination was made and include a copy of any analytical results used to make this determination.

C-28, C-3a(4) - Waste Characteristics: Second Third Wastes With Treatment Standards [OAC 3745-59-43]

The Part A indicates proposed storage of P029 and P098, second third restricted wastes with treatment standards. The waste analysis plan shall indicate if these waste streams exceed the applicable treatment standards. Indicate how this determination was made and include a copy of any analytical results used to make this determination.

C-29, C-3b - Notification and Certification Requirements  
[OAC 3745-59-07]

Section 3, Page 7 of the application indicates that a notification will accompany restricted waste being sent to a disposal facility. The application shall indicate that a notification will accompany restricted waste being sent to an off-site TSDF.

C-30, C-3b - Notification and Certification Requirements  
[OAC 3745-59-07]

The waste analysis plan shall describe procedures for preparing and maintaining applicable notifications.

C-31, C-3b(1) - Retention of Generator Notices and Certifications  
[OAC 3745-59-07(A)]

The application shall indicate that the notifications and any waste analysis data will be retained on site a minimum of five years from the date the waste was last sent to the off-site facility.

C-32, C-3c(1) - Restricted Wastes Stored in Containers  
[OAC 3745-59-50(A)(2)(a)]

Section B, Page 5 indicates that "correct" labels are attached to containers. The application shall indicate that the labels on containers will identify the contents and the date of accumulation.

D. PROCESS INFORMATION

C-33, D-1a(1) - Description of Containers [OAC 3745-55-71]

The approximate number of each type of container, container dimensions and container condition (new, used, or reconditioned) shall be provided.

C-34, D-1a(3)(a) - Requirement for The Base or Liner to Contain Liquids [OAC 3745-55-75(B)(1)]

Section B, Page 1 indicates that the base is free of cracks. This section shall indicate that the base is free of cracks or gaps.

This section indicates that the concrete slab is compatible with the hazardous waste. Explain how the determination was made that the base (concrete slab) is compatible with wastes to be stored. Include a demonstration of the base imperviousness to waste in the event of a spill. Include a discussion of the age of the base, type of concrete, etc.

C-29, C-3b - Notification and Certification Requirements  
[OAC 3745-59-07]

Section 3, Page 7 of the application indicates that a notification will accompany restricted waste being sent to a disposal facility. The application shall indicate that a notification will accompany restricted waste being sent to an off-site TSDF.

C-30, C-3b - Notification and Certification Requirements  
[OAC 3745-59-07]

The waste analysis plan shall describe procedures for preparing and maintaining applicable notifications.

C-31, C-3b(1) - Retention of Generator Notices and Certifications  
[OAC 3745-59-07(A)]

The application shall indicate that the notifications and any waste analysis data will be retained on site a minimum of five years from the date the waste was last sent to the off-site facility.

C-32, C-3c(1) - Restricted Wastes Stored in Containers  
[OAC 3745-59-50(A) (2) (a)]

Section B, Page 5 indicates that "correct" labels are attached to containers. The application shall indicate that the labels on containers will identify the contents and the date of accumulation.

D. PROCESS INFORMATION

C-33, D-1a(1) - Description of Containers [OAC 3745-55-71]

The approximate number of each type of container, container dimensions and container condition (new, used, or reconditioned) shall be provided.

C-34, D-1a(3) (a) - Requirement for The Base or Liner to Contain Liquids [OAC 3745-55-75(B) (1)]

Section B, Page 1 indicates that the base is free of cracks. This section shall indicate that the base is free of cracks or gaps.

This section indicates that the concrete slab is compatible with the hazardous waste. Explain how the determination was made that the base (concrete slab) is compatible with wastes to be stored. Include a demonstration of the base imperviousness to waste in the event of a spill. Include a discussion of the age of the base, type of concrete, etc.

C-35, D-1a(3) (a) - Requirement for The Base or Liner to Contain  
Liquids [OAC 3745-55-75(B) (1)]

Section B includes an engineering evaluation of the structural integrity of the base. This engineering evaluation was performed by an engineer employed by the facility. The engineering evaluation shall be performed by a licensed independent engineer.

The certification should include the data/facts/calculations of how it was determined that the proposed container storage area base is sound and will not crack or deteriorate under the weight of the containers you are proposing to store. If drawings or blueprints are available of how the base was constructed, then these should be provided.

C-36, D-1a(3) (c) - Containment System Capacity  
[OAC 3745-55-75(B) (3)]

Section B indicates that containers will be placed on wooden pallets. Include a description of the pallets which addresses pallet dimensions. Calculations shall be provided for the volume displaced by these pallets.

Section B, Page 2 indicates that process raw material will be stored in the building in drums, bagged material on skids and in a tank.

Will these raw materials be stored in the same diked area as the hazardous waste? If yes, then a description, including dimensions of the skids, drums and tank shall be provided. Calculations shall be provided for the volume displaced in these raw material skids, containers and tank. The maximum number of these drums and skids shall be provided. If these raw materials are stored in the same diked area as the hazardous waste, they will have a direct effect on the containment capacity of the storage area.

It is strongly recommended that CCF only store hazardous waste in the proposed hazardous waste storage building.

If CCF insists on storing process raw materials in the proposed hazardous waste storage building, then this section shall reference the waste characteristics section and shall include a discussion of the compatibility of the raw material and waste. It should be indicated how compatibility was determined. Any analytical data used to make this determination shall be included.

G. CONTINGENCY PLAN

C-37, G-6 - Coordination Agreements [OAC 3745-54-52(c)]

Section 7, Page 55 references copies of letters sent to emergency service authorities. The contingency plan shall describe the arrangements and or agreements with these emergency service authorities listed in the application.

H. PERSONNEL TRAINING

C-38, H-1d - Relevance of Training to Job Position  
[OAC 3745-54-16(A) (1)]

The application fails to describe the training to be received by foremen.

C-39, H-1e - Training for Emergency Response [OAC 3745-54-16(A) (3)]

Section 12 indicates that the emergency brigade will receive training in fire fighting on an annual basis as part of their hazardous waste emergency training. An outline detailing this specific training shall be provided.

I. CLOSURE PLANS, POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS

C-40, I-1d(1) (a) - Extensions for Closure Time  
[OAC 3745-55-13(A) (B)]

The application shall include a statement indicating that if closure activity cannot be completed within the allotted time, then CCF will request an extension of time allowed for closure in accordance with this rule.

C-41, I-8a(1) - Endorsement or Certification [OAC 3745-55-47(A) (1)]

The Certificate of Insurance indicates that it expired on July 1, 1986. A current, unexpired Certificate of Insurance shall be provided.

J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

C-42, J-1 - Solid Waste Management Units [40 CFR 264.101]

Review of this portion of the application will be handled by U.S.EPA staff.

C-43, J-2b - No Releases [40 CFR 264.101]

Review of this portion of the application will be handled by U.S.EPA staff.

PART B REVIEW COMMENTS

COLUMBUS COATED FABRICS  
OHD004294351/01-25-0145

TECHNICAL EVALUATION COMMENTS

B. FACILITY DESCRIPTION

T-1, B-2a - General Requirements [OAC 3745-50-44 (A) (19)]

Section 19, Page 1 indicates that Figure 2 is a topographic map. The topographic map is labelled Figure 2a. Correct this discrepancy.

T-2, B-2a - General Requirements [OAC 3745-50-44 (A) (19) (a)]

The date and revision number on the top right corner of the topographic map is illegible.

T-3, B-2a - General Requirements [OAC 3745-50-44 (A) (19)]

Section 19, Page 1 indicates that the topographic map contour line interval of 10 feet was discussed with Kathy Homer at U.S. EPA and that this contour interval is acceptable. Since this CCF application is for an OHIO EPA Part B Permit, discussions with U.S. EPA are irrelevant. The contour interval shall be 5 feet if relief is greater than 20 feet or 2 foot intervals if the relief is less than 20 feet.

T-4, B-2a - General Requirements [OAC 3745-50-44 (A) (19) (b)]

Section 19, Page 1 indicates that the floodplain map is at a scale of 1 inch equal to 1,000 feet. The application indicates that a discussion with Region V, EPA resulted in the approval for the submission of this scale of 1 inch equal to 1,000 feet. Discussions with U.S. EPA regarding an OHIO Part B Permit are irrelevant.

The scale used for the floodplain map shall be equal to 1 inch equal to not more than 200 feet. Include a date on this map.

T-5, B-2a - General Requirements [OAC 3745-50-44 (A) (19)]

The topographic map shall extend at least 1,000 feet to the east of the facility.

T-6, B-2a - General Requirements [OAC 3745-50-44 (A) (19)]

The Facility Description Section indicates that Figure 4 includes roads within the plant area. The only roadway shown is at the hazardous waste storage building. Are there other access roads at the facility? If so, they shall be included.

T-7, B-2a - General Requirements [OAC 3745-50-44(A)(19)(e)]

Figure 3 indicates a wind rose map. This map shall include a date.

T-8, B-2a - General Requirements [OAC 3745-50-44(A)(19)(j)]

The topographic map shall include catch basins and fire hydrants. Is the 100,000 gallon, 100 foot water tower for fire fighting purposes?

T-9, B-2a - General Requirements [OAC 3745-50-44(A)(19)(i)]

The application and the map do not indicate if there are withdrawal wells located within one-quarter mile of the facility.

T-10, B-2a - General Requirements [OAC 3745-50-44(A)(19)(f)]

Section 19, Page 2 indicates that Figures 1-6 all contain a map orientation. Figure 6 is a longitudinal section view looking north, but does not show a map orientation.

T-11, B-2a - General Requirements [OAC 3745-50-44(A)(19)(a)]

The map scale on Figure 5 is illegible. Portions of general Map Number 1 are illegible. Legible maps shall be submitted.

T-12, B-3b - Floodplain Standard [OAC 3745-50-44(A)(19)(b)]

The print below the "Key to Symbols" on the map is illegible. Submit a legible map.

It is recommended that the map source be stated on the map itself, namely, the U.S. Department of Housing and Urban Development Flood Hazard Boundary Map (as indicated in the application).

T-13, B-4 - Traffic Information [OAC 3745-50-44(A)(10)]

Calculations used to determine the weight of a tractor trailer holding a maximum of seventy-six drums are provided. Describe the procedures which will be taken to prevent this weight from being exceeded (60,000 pounds).

T-14, B-4 - Traffic Information [OAC 3745-50-44(A)(10)]

Calculations and or all other information shall be provided to verify the claim that the load-bearing capacity of the road is 60,000 pounds.

D. PROCESS INFORMATION

T-15, D-1a(2) - Container Management Practices [OAC 3745-55-73]

Section B, Page 5 indicates that containers of Dust Stop Oil are opened for the purpose of pumping the oil into a bulk tank truck for off-site treatment. Where are these containers located when they are pumped? Describe the procedures to be taken to insure that spills or leaks will not occur when the oil is pumped from the drums.

T-16, D-1a(3) - Secondary Containment System Design and Operation  
[OAC 3745-55-75(B) (3)]

Figure 5 indicates a concrete curb at Building 37. This figure shall specify the curb height.

T-17, D-1a(3) (b) - Containment System Drainage  
[OAC 3745-55-75(B) (2)]

Section B, Page 2 indicates that containers are kept from contact with any standing liquids since they are stored on wooden pallets. This section indicates that the bottom row of containers is approximately six inches above the floor.

Figure 6, a cross-section of the hazardous waste storage building, depicts the bottom row of stored containers to be less than six inches above the floor and therefore not protected from contact with accumulated liquids. Figure 6 should be revised to depict the bottom of the containers at an elevation greater than six inches and therefore protected from contact with accumulated liquids.

T-18, D-1a(3) (e) - Removal of Liquids From Containment Systems  
[OAC 3745-55-75(B) (5)]

Section B, Page 1 indicates that all waste and solids in the sump are handled as hazardous waste if an analysis indicates that it is hazardous waste. The application references the contingency plan, Page 15 which indicates that the spilled waste will be manifested to an appropriate hazardous waste facility. Clarify this discrepancy. If analysis of spill residue is to be conducted, then reference the section of the waste analysis plan for a description of sampling and test methods proposed to be used. Indicate why knowledge of the waste and use of the operating log would not take precedence over analysis.

Indicate the response time for pumping a spill from the sump to appropriate containers.

F. PROCEDURES TO PREVENT HAZARDS

T-19, F-1a(3) - Warning Signs [OAC 3745-54-14(C)]

The application indicates that warning signs are posted at the entrance to the hazardous waste storage building. The application shall indicate that these signs will be placed at all entries to the active portion of the facility and at intervals so that they are visible from all angles of approach. Include a description of the warning sign design (color, dimensions and the height of the letters on the signs). Include a statement that the warning signs will be legible from a distance of at least 25 feet.

T-20, F-2a - General Inspection Requirements [OAC 3745-54-15]

The inspection schedule indicates that certain areas and specific items will be inspected on a daily basis. The inspection log sheet shall be revised to allow for recording inspections which are to be performed on a daily basis.

It is recommended that the inspection schedule be incorporated into the inspection log to eliminate the possibility of missing areas and items found on the inspection schedule.

If the inspection schedule is not incorporated into the inspection log sheet, indicate how specific inspection items will not be overlooked.

T-21, F-2a(2) - Frequency of Inspection [OAC 3745-54-15(B)(4)]

The inspection schedule should indicate that areas subject to spills, such as loading and unloading areas, will be inspected daily when in use.

T-22, F-3a(4) - Water for Fire Control [OAC 3745-54-32(D)]

Section 7, Page 41 indicates that a 50 gpm discharge capacity is available for the sprinkler system and the fire hose.

The application shall indicate the following:

- The primary water source.
- The available psig.
- Any secondary water supplies such as gravity tanks which may be available for use.

In the event of an unplanned or emergency situation, what do you estimate as the maximum water requirement in gpm?

T-23, F-4b - Run-off [OAC 3745-50-44 (A) (8) (b) ]

The details of the container storage area are discussed in the Specific Information Requirement Section. Section 8 should reference Section B regarding the structures and equipment used to prevent run-off.

T-24, F-4e - Personnel Protection Equipment  
[OAC 3745-50-44 (A) (8) (e) ]

This section of the application shall reference other sections of the application which provide the details of personnel protection equipment, such as the personnel training and contingency plan sections.

T-25, F-5a - Precautions to Prevent Ignition or Reaction of  
Ignitable or Reactive Wastes [OAC 3745-50-44 (A) (9) ]

This section of the application shall include a list of each hazardous waste stream proposed to be stored which is either ignitable, reactive or incompatible.

The application shall indicate the precautions to be taken to prevent accidental ignition of waste. Describe how the waste will be protected from cutting and welding, hot surface, frictional heat, sparks (static, electrical or mechanical) spontaneous ignition and radiant heat.

Section 9, Page 1 indicates that it is stated in Section B, Page 5 that no incompatible materials are stored in the hazardous waste storage building. Section B, Page 5 does not include a discussion of incompatibles. Clarify this discrepancy.

It is recommended that "No Smoking" signs be placed inside the storage area as well as on the building exterior.

T-26, F-5b - General Precautions for Handling Ignitable or Reactive  
Waste and Mixing of Incompatible Waste  
[OAC 3745-54-17 (B) ]

Section B, Page 5 provides a copy of an inter-company and office correspondence which indicates that a system will be established to assure that no reactive combinations of materials will be stored. The application shall describe this system in detail including precautions taken to prevent reactions which:

- Generate extreme heat or pressure, fire, explosions or violent reactions.

- Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment.
- Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions.
- Damage the structural integrity of the building.
- May threaten human health or the environment.

T-27, F-5c - Management of Ignitable or Reactive Wastes in Containers [OAC 3745-55-76]

Section B, Page 1 refers to Figure 5. The scale for Figure 5 is illegible.

T-28, F-5d - Management of Incompatible Wastes in Containers [OAC 3745-55-77]

Section B, Page 2 indicates that hazardous waste and process raw materials are compatible. Section 9, Page 1 indicates that incompatible materials are not stored in the hazardous waste storage building. It is indicated elsewhere in the application that incompatible wastes are generated in the engraving and plating departments. Correct this discrepancy.

Provide an explanation and the documentation necessary which will verify the claim made in Section B, Page 2 that all hazardous wastes and process materials are compatibles.

#### G. CONTINGENCY PLAN

T-29, G-1 - General Information [OAC 3745-54-50 to 56]

Page 1a, the site plan appears to have been cut off at the right side of the page. Revise this site plan.

Section 7, Pages 23, 24 and 27 are illegible and some do not contain dates. Revise.

Section 7, Pages 29 and 30 indicates response actions for "unavoidable spills". Define what is meant by unavoidable and provide examples. Will response actions differ for avoidable spills?

T-30, G-2 - Emergency Coordinators [OAC 3745-54-52(D)]

Section 7, Page 33 indicates the names of employees who have authority to implement the emergency procedures described in the contingency plan. Clarify why only a few of the alternate emergency coordinators listed on Pages 29, 30, 31 and 32 have the authority to commit resources to the plan.

The list on Page 31, Section 7 indicates the emergency coordinators to be called in the event of a fire or a major spill. The lists of alternate emergency coordinators on Pages 30, 32, and 33 are not in the same order as Page 31. None of these lists are in the same order. It is recommended that one concise list for the emergency coordinator and alternates be submitted.

Page 17 indicates that Pages 63 and 64 list alternate emergency coordinators. Our application is missing Pages 63 and 64.

T-31, G-4a - Notification [OAC 3745-54-56(A)]

Section 7, Page 18 indicates that in the event of a spill entering the storm sewer system, the City of Columbus would be notified. Indicate when the City would be notified if the potential of a spill entering the storm sewer exists (such as 7 minutes after the spill is discovered).

Section 7, Page 29 lists the Ohio EPA, Division of Emergency Response along with four other emergency service authorities. Describe examples of the emergencies which may arise when these emergency service authorities will be called.

T-32, G-4b - Identification of Hazardous Materials  
[OAC 3745-54-56(B)]

Section 7, Page 16. The plan shall indicate that along with visually identifying the contents of a leaking drum; that inspection/operating records will be reviewed and, if necessary, chemical analysis of the spilled material and or container contents will be conducted.

T-33, G-4c - Assessment [OAC 3745-54-56(C)]

Page 17 of the plan indicates that the emergency coordinator will use a visual inspection and or on-site analytical capabilities to determine if the emergency situation presents a serious threat to human health inside and outside the facility.

Describe the on-site analytical capabilities. Who would collect samples to be analyzed? Include the criteria used to determine when samples should be collected/analyzed. Include the criteria used to determine if a serious threat to human health or the environment exists inside or outside the facility. Criteria to be used should include any direct or indirect effects of the release (examples may include a hazardous surface water run-off, gases released due to a release, fire or explosion).

T-34, G-4g - Incompatible Waste [OAC 3745-54-56(H) (1)]

Section 7, Page 39 shall indicate that hazardous waste activity will resume only after all hazardous waste is containerized and the area is documented to be clean.

Section 7, Page 39 indicates that if, due to a fire, explosion, or release, the hazardous waste and solvent still activity will be ceased and will be monitored by the solvent still operation. Explain what this statement means.

T-35, G-5 - Emergency Equipment [OAC 3745-54-52(E)]

The application shall incorporate all emergency equipment at the facility onto one list which includes the location, a physical description of each item and a brief outline of its capabilities. The current list fails to include all of the items mentioned in the plan, such as:

- Page 13 - bags of clay, scrap cloth
- Page 14 - booms
- Page 16 - floor dry type of absorbent/absorbent type pillow
- Page 19 - squeegees

T-36, G-6 - Coordination Agreements [OAC 3745-54-52(C)]

The plan indicates that as any updates of the contingency plan are initiated, they will be forwarded to the local fire department, police and hospitals. This plan has been updated three times in 1989. Copies of letters forwarding the plan to emergency service authorities are all dated December 15, 1988. Correct this discrepancy.

T-37, G-7 - Evacuation Plan [OAC 3745-54-52(F)]

Page 43. The legend for primary and alternate evacuation routes is incomplete.

Page 36 indicates that in the event of a fire, explosion or other major incident, the operating foreman will activate the fire alarm. Indicate if the fire alarm will be the designated signal to begin evacuation. If another signal is to be used, describe that signal.

T-38, G-8 - Required reports [OAC 3745-54-56(J)]

Section 7, Page 54 indicates that written reports will be submitted to the appropriate Ohio EPA authority. The application shall indicate that these required reports will be submitted to the Director, Ohio EPA.

#### H. PERSONNEL TRAINING

T-39, H-1 - Outline of The Training Program [OAC 3745-54-16(A) (1)]

This section lists training courses attended by the plant manager, the senior project engineer, etc. Are these training courses the initial and annual training? If not, then provide an outline of the initial and annual training for these employees.

T-40, H-1a - Job Title/Job Description [OAC 3745-54-16(D) (1) (2)]

Addendum 1 indicates that hazardous waste training is received by pan wash printers, DN-14 urethane top coat, hazardous waste building - pan room and color weigher. The application shall include the job titles and job descriptions for these 22 employees.

The application indicates that the actual handling of wastes are a partial responsibility of the Production of Waste Coordinator (PWC). The PWC is not shown on Figure 9 as indicated, nor is the name, job title or job description included. Correct this discrepancy.

The name(s) of the laboratory analysis coordinator, foremen and operators shall be included for each employee whose position requires the handling of hazardous waste.

Section 12 and Addendum 1 both provide the job description and job titles for the same positions at CCF. Why is this identical information duplicated in two sections of the permit?

Pages in this section are not numbered sequentially. Correct this deficiency.

T-41, H-1b - Training Content, Frequency and Techniques  
[OAC 3745-54-16]

Addendum 1 includes a February 15, 1990 communication regarding an annual hazardous waste training to be held on February 20, 1990. Did all hazardous waste handling employees attend? If not, which employees attended? Is this training a part of the annual refresher training?

Figures 10 and 11 indicate training was received by three (3) employees in 1982. Submit training records for 1989 - 1990.

T-42, H-1c - Training Director [OAC 3745-54-16(A) (2)]

The description of the training coordinator includes three courses as experience and qualification requirements for the job. Are these three courses considered the annual refresher training? If not, provide an outline of the refresher training to be received by the training coordinator.

T-43, H-1d - Relevance of Training to Job Position  
[OAC 3745-54-16(A) (2)]

The application indicates that hazardous waste handling personnel are issued aprons, gloves, safety glasses and respirators. Training for employees who are required to respond to spills shall include training with personal protection equipment. Indicate under what conditions this equipment will be used.

T-44, H-1e - Training for Emergency [OAC 3745-54-16(A) (3)]

Addendum 1 in this section indicates the order in which to call key personnel. The listed order does not coincide with the various lists of emergency coordinators in the contingency plan. Correct this discrepancy.

I. CLOSURE PLANS, POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS

T-45, I-1a - Closure Performance Standard [OAC 3745-55-11]

The closure performance standard has not been met because the closure plan does not meet the requirements of this rule and the Ohio EPA, Division of Solid and Hazardous Waste Management Closure Plan Review Guidance dated February 8, 1988.

T-46, I-1b - Partial Closure and Final Closure Activities  
[OAC 3745-55-12(B) (4)]

The application indicates that soil samples will be analyzed if soil is suspected of being contaminated. The application shall indicate that soils will be sampled and analyzed to confirm the absence of contaminants. The application shall include the sampling methods and testing methods for each constituent likely to be present in the soil (as a result of facility operations).

T-47, I-1d - Schedule for Closure [OAC 3745-55-12(B) (6)]

The application shall allot time for soil sampling, soil analysis, disposal or decontamination of equipment and structures, and testing of wash water and rinse water.

T-48, I-1e(2) - Disposal or Decontamination of Equipment, Structures and Soils [OAC 3745-55-12(B) (4) and 3745-55-14]

The application shall include a detailed description of the steps or procedures which will be taken to decontaminate or dispose of equipment, structures, soils, residues or any other clean-up materials associated with closure.

T-49, I-1e(4) - Closure of Containers [OAC 3745-55-12(B) (3) and 3745-55-78]

The application shall indicate that if rinse waters indicate the area is not clean, additional washing and rinsing will be conducted followed by additional testing of the rinse waters to verify the area is free of contamination. Rinseate clean levels must meet Ohio EPA, Division of Solid and Hazardous Waste Management clean levels.

The application shall indicate how disposal of empty containers will be accomplished.

T-50, I-3a - Certification of Closure [OAC 3745-55-15]

The application shall indicate that within 60 days of completion of closure, CCF and an independent, professional engineer will submit a certification of closure indicating that the closure was conducted in accordance with the approved closure plan.

K. OTHER FEDERAL LAWS

T-51 - [40 CFR 270.14b(20), 270.3] and [OAC 3745-50-44(A)(20)]

If CCF is not governed by any of the federal laws listed in this section, then delete the words we believe from the first sentence in this section.

CCF/TechCmts.

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



March 8, 1990

Mr Thomas Crepeau  
Ohio EPA, DSHWM  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43266-0149

Dear Mr. Crepeau:

I have enclosed a revised Part B Permit Application for Columbus Coated Fabrics, OHD004294351, addressing the deficiencies noted in the letter of December 29, 1989 from Edward A. Kitchen, Manager, Technical Assistance and Engineering Section, DSHWM.

A. Part A Application

1. [OAC 3745-50-43(A) (3)]  
The part A has been revised to reflect that this facility has a current USEPA Part B Permit.
2. [OAC 3745-50-43(A) (4)]  
The scale drawing of the facility has been replaced with a drawing showing all present buildings belonging to Columbus Coated Fabrics which generate hazardous waste along with those buildings and properties contiguous with them.
3. [OAC 3745-50-43(A) (5)]  
Actual photographs of the entire facility perimeter, the hazardous waste storage building and loading dock, and the Plating and Engraving Departments have been included as part of the revised Part A Permit Application.
4. [OAC 3745-50-41 (D) (6)]  
Maps have been provided showing contour lines, intake wells, sewer lines and fire hydrants are included. No drinking water wells, springs nor surface water bodies are known to be within one quarter mile of this facility.

B. Facility Description

5. B.2 Topographic Map [OAC 3745-50-44(A) (19)]  
Locations of manholes and fire hydrants have been provided as figure 2a.
6. B.4 Traffic Information [3745-50-44(A) (10)]  
Traffic on the internal roadway and concrete thickness have been added to Section 12, Traffic Patterns.

C. Waste Characteristics

7. C.1 Chemical and Physical Analysis [OAC 3745-54-13]  
Processes generating the wastes listed in item seven have been described in the General Facility Description. Hazard characteristics and the basis for hazard designation have been added to the Section 2, Hazardous Waste Analyses. All wastes listed on page 3 in the Part A application have been addressed.
8. C.2a Waste Analysis Plan-Parameters and Rationale  
[OAC 3745-54-13(B) (1)]  
Table 1 has been revised to address all waste streams and all parameters required for storage and disposal.
9. C.2c Waste Analysis Plan-Sampling Methods  
[OAC 3745-54-13(B) (3)]  
The sampling methods have been updated to show those for all hazardous waste streams sampled. The rags are not sampled since the hazard associated with them is due to the material known to have been wiped with them.
10. C.2f Waste Analysis Plan-Additional Requirements for  
Ignitable, Reactive or Incompatible Wastes  
[OAC 3745-54-13(B) (6)]  
Identification of incompatible waste streams has been added.
11. C.3 Waste Analysis Requirements Pertaining to Land Disposal  
Restrictions [40 CFR 268.7]

Analytical data shows information necessary to assess disposal of generated waste in accordance with Land Disposal Restrictions. A statement was added the Waste Analysis Plan stipulating the requirement to obtain such information.

D. Process Information

12. D.1a(1) Description of Containers [OAC 3745-55-71]  
Since 17E drums were described in Section B, along with the DOT specification number, as the storage containers for hazardous waste I believe item 12 has already been addressed. A statement has been added to include 17H drums and High Density Polyethylene liners which are used in accumulating less than ninety day hazardous wastes.
13. D.1a(2) Container Management Practices [OAC 3745-55-73]  
The section in which the paint filter test is located is Section 3, not Section 2 as was stated. This typographical error has been corrected.

Management practices for handling all hazardous wastes stored in the Hazardous Waste Storage Building have been provided in Section B.

The minimum aisle space between rows of hazardous waste has been provided in Section B.

14. D.1a(3) (a) Requirements for the Base or Liner to Contain Liquids [OAC 3745-55-75(B) (1)]

A statement has been added describing the condition of the concrete slab. The base is described as six (6) inch thick reinforced concrete without cracks. The waste contains no corrosive nor reactive material. The entire building is enclosed and weather tight. Therefore, I believe that the base has been shown to be impervious to the hazardous wastes to which it could be exposed.

An engineering evaluation of the structural integrity of the base has been included.

H. Personnel Training

15. H.1a Job Title/Job Description [OAC 3745-54-16(D)]  
The job title and description for plant superintendent has been included.

16. H.1d Relavance of Training to Job Position  
[OAC 3745-54-16(A) (2)]  
Training for all those handling hazardous waste has been included.

17. H.1e Training for Emergency Response [OAC 3745-54-16(A) (3)]

I. Closure and Post-Closure Requirements

18. I.1e Ancillary Closure Requirements [OAC 3745-55-12(B) (5)]  
Containment conditions during steam cleaning have been added.

19. I.5e Financial Test and Corporate Guarantee for Closure  
[OAC 3745-55-43(F)]  
The financial test letter for 1988 has been included in this revision.

20. I.8a(1) Endorsement or Certification [OAC 3745-55-47]  
The Certificate included with this Part B Application Revision is current.

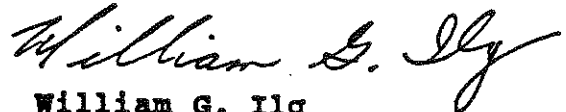
K. Other Federal Laws

21 [40 CFR 270.14(b)(20). 270.3]  
Included in Section 20.

It is the belief of Columbus Coated Fabrics that the information provided in this revised Part B Permit Application addresses the deficiencies in the above mentioned letter.

If you have any questions or require additional information, please contact me.

Sincerely,



William G. Ilg  
Senior Project Engineer  
(614) 297-6043

cc: Jennifer Hille, Ohio EPA, DSHWM, CDO  
Lisa Pierard, U.S. EPA, Region V  
cc: without attachments  
Edward A. Kitchen, Manager, DSHWM



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020 Fax (614) 644-2329

Richard F. Celeste  
Governor

CERTIFIED MAIL

*Steve*  
*Part B*  
RE: Columbus Coated Fabrics  
OHD 004 294 351  
OHIO 01-25-0145

December 29, 1989

Columbus Coated Fabrics  
Attn.: William G. Ilg  
P.O. Box 208  
Columbus, Ohio 43216

Dear Mr. Ilg:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility.

As you may know, Ohio has recently been delegated authorization to operate its hazardous waste management program in lieu of the Federal hazardous waste program. Ohio now has the responsibility for issuing Resource Conservation and Recovery Act (RCRA) permits for hazardous waste treatment, storage and disposal facilities subject to the authority retained by U.S. EPA under the Hazardous and Solid Waste Amendment of 1984 (HSWA) to RCRA. Since the requirements and prohibitions imposed by HSWA are effective immediately regardless of a State's authorization status, USEPA will continue to implement the applicable HSWA requirements. In other words under HSWA, there will continue to be a dual State/Federal regulatory program in Ohio. To the extent Ohio's authorized program is unaffected by HSWA, the Ohio program will operate in lieu of the Federal program. To the extent HSWA-related requirements are in effect, USEPA will continue to administer and enforce those portions of HSWA in Ohio (which may include the issuance of full or partial permits) until Ohio receives authorization to do so and until that time, Ohio will continue to assist USEPA's implementation of the HSWA requirements under a cooperative agreement.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a "completeness" review of your Part B application and has determined it to be incomplete. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapter in the Ohio Administrative Code.

We have enclosed comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to

Mr. Ilg  
Page 2

Ohio EPA within 30 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck.
2. New language is capitalized
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau,  
Ohio EPA, DSHWM  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43266-0149

Jennifer Hille  
Ohio EPA, DSHWM, CDO  
2305 Westbrook Drive, Building C  
Columbus, Ohio 43266

Lisa Pierard,  
RCRA Activities  
Part B Application  
U.S. EPA - Region V  
Chicago, Illinois 60690-3587

Upon receipt of a satisfactory response regarding all the information requested, Ohio EPA will notify you in writing that the application is complete. Our determination of completeness will mean that all items required by regulation appear to have been addressed in your application, but does not mean that these items have been addressed substantively or in adequate detail which would allow a determination to be made as to whether the proposal complies with the Director's Hazardous Waste Facility Standards Chapters. We may request additional information from you, if it is necessary to clarify, modify or supplement previous submissions of information in order to substantively evaluate the permit application for technical adequacy.

Mr. Ilg  
Page 3

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the application for a renewal permit, 3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action, or 4) the application for a renewal permit may be returned to you as incomplete.

If you have any questions concerning the review of the permit application, or the level of detail we expect, please do not hesitate to contact Robert F. Babik, at (614) 644-2949.

Yours truly,

*Edward A. Kitchen / by Welch*

Edward A. Kitchen, Manager  
Technical Assistance and Engineering Section  
Division of Solid and Hazardous Waste Management  
23AK/pas

2031U

cc: Lisa Pierard, USEPA  
Joel Morbito, USEPA  
Jennifer Hille, CDO, DSHWM, OEPA  
Ed Lim, CO, DSHWM, OEPA  
Robert F. Babik, CO, DSHWM, OEPA

Columbus Coated Fabrics  
OHD004294351/ 01-25-0145  
Part B Application Completeness Review Comments

A. Part A Application

1. [OAC 3745-50-43(A)(3)]

It is incorrectly stated that this is a first application rather than a revised application.

2. [OAC 3745-50-43(A)(4)]

The scale drawing showing the locations of all past, present and future treatment, storage and disposal areas does not clearly indicate where Department 48 is located.

3. [OAC 3745-50-43(A)(5)]

Actual photographs should be included of the facility clearly delineating all existing structures, existing storage areas and sites of future storage areas.

4. [OAC 3745-50-41(D)(6)]

A topographic map is not provided which shows the area extending one mile beyond the property boundaries of the source, depicting the facility and each of its intake and discharge structures; each hazardous waste treatment, storage or disposal unit and those wells, springs, other surface water bodies and drinking water wells listed in public records or otherwise known to the applicant within one-quarter mile of the facility property boundary.

B. Facility Description

5. B.2 Topographic Map [OAC 3745-50-44(A)(19)]

Locations of catch basins, manholes and fire hydrants are not included on any of the enclosed maps.

6. B.4 Traffic Information [OAC 3745-50-44(A)(10)]

The estimated volume of traffic, including numbers and types of vehicles should be included.

Calculations should be provided to verify the claim that the road has the capacity to hold 60,000 pounds.

C. Waste Characteristics

7. C.1 Chemical and Physical Analysis [OAC 3745-54-13]

The application does not describe the waste, the hazard characteristics and the basis for hazard designation for the following waste streams for which waste analysis is provided:

- copper sulfate rags
- chromic sludge
- rags with chromic acid
- rags with cyanide
- used ferric chloride
- used monoethanamine
- used hydrochloric acid
- used xylene based dev.(?)
- used zinc chloride
- waste muriatic acid
- oil absorbent material

The waste analysis plan does not address all of the waste streams which the facility has requested to handle on page 3 of its Part A application.

8. C.2a Waste Analysis Plan-Parameters and Rationale  
[OAC 3745-54-13(B)(1)]

Table 1 does not address all the waste streams listed in the Part A application. A complete list of parameters which have been chosen for analysis and the rationale for their selection has not been provided. Parameters to be tested should also include any parameters, such as physical properties, which must be known to store the waste in accordance with Ohio regulations, not only the parameters necessary to determine how to dispose of the waste.

9. C.2c Waste Analysis Plan-Sampling Methods [OAC 3745-54-13(B)(3)]

The sampling methods which will be used to obtain a representative sample of the waste are only provided for a few of the waste streams generated.

10. C.2f Waste Analysis Plan-Additional Requirements for Ignitable, Reactive or Incompatible Wastes [OAC 3745-54-13(B)(6)]

The waste analysis plan does not indicate if any incompatible waste streams are generated on-site.

11. C.3. Waste Analysis Requirements Pertaining to Land Disposal Restrictions [40 CFR 268.7]

For each hazardous waste stored at the facility, analytical data or information from knowledge of the waste must be provided to determine if the waste is a restricted waste under 40 CFR 268.

D. Process Information

12. D.1a(1) Description of Containers [OAC 3745-55-71]

The construction material and dimensions and useable volumes for the containers used should be provided.

13. D.1a(2) Container Management Practices [OAC 3745-55-73]

No test to determine whether a material is a solid is described on page 1 and 2 of Section 2-Hazardous Waste Analysis as stated.

Only management practices for the handling of pan wash tank waste are described on pages 14 and 15 of Section 12-Personnel Training. General management practices for the handling of all wastes to be stored in the Hazardous Waste Storage Building should be stated.

The amount of aisle space maintained between rows of containers should be stated.

14. D.1a(3)(a) Requirement for the Base or Liner to Contain Liquids [OAC 3745-55-75(B)(1)]

The demonstration that the base is capable of containing liquids should include :

- a statement that the base is free of cracks or gaps
- demonstration of imperviousness of base to wastes and precipitation
- engineering evaluation of structural integrity of base

H. Personnel Training

15. H.1a Job Title/Job Description [OAC 3745-54-16(D)]

The job title and job description for plant superintendent is not included in the application.

16. H.1d Relevance of Training to Job Position [OAC 3745-54-16(A)(2)]

Training in hazardous waste management procedures received by personnel other than those working in the pan wash tank area or the banbury operators should be described.

17. H.1e Training for Emergency Response [OAC 3745-54-16(A)(3)]

Training received by Fire Brigade personnel should be described.

I. Closure and Post-Closure Requirements

18. I.1e Ancillary Closure Requirements [OAC 3745-55-12(B)(5)]

The closure plan does not describe run-off control measures which will be taken during steam cleaning operations.

19. I.5e Financial Test and Corporate Guarantee for Closure [OAC 3745-55-43(F)]

The wording of OAC 3745-55-51(F) requires that the letter from the chief financial officer to support the firm's use of the financial test should be updated at the end of each fiscal year. A statement for the fiscal year ending December 31, 1988 should be provided.

20. I.8a(1) Endorsement or Certification [OAC 3745-55-47]

The most updated Certificate of Liability Insurance should be provided. The certificate in the application is dated 1984.

21. K. Other Federal Laws [40CFR 270.14(b)(20), 270.3]

The permit application does not demonstrate compliance with the requirements of applicable Federal laws such as the Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone management Act, and the Fish and Wildlife Coordination Act.

I

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



29 June 1989

Ohio EPA  
Division of Solid & Hazardous Waste  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43266-0149

ATTENTION: Edwin Lim

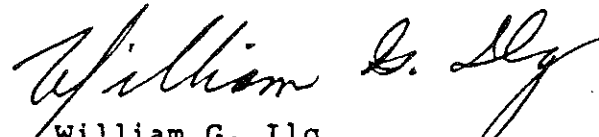
Dear Mr. Lim:

Enclosed is a second copy of our complete Part "B" submission. This is an exact copy of the first manual (completely updated as of May 1989) delivered to you early in June.

Please forward to the proper person in the Central District Office.

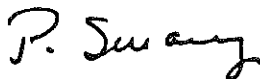
Thank you.

Very truly yours,

  
William G. Ilg  
Environmental Coordinator  
COLUMBUS COATED FABRICS

WGI/190

Enclosure



RECEIVED  
OHIO EPA

JUN 30 1989

DIV. of SOLID & HAZ. WASTE MGT.

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



30 May 1989

Ohio EPA  
Division of Solid and Hazardous Waste Management  
P.O. Box 1049  
1800 WaterMark Drive  
Columbus, Ohio 43266-0149

Attention: Edward A. Kitchen; Manager, Technical Assistance  
and Engineering Section

Dear Mr. Kitchen:

Enclosed is a copy of our complete Part "B" Submission. This manual has been completely revised and updated as of May 1989.

A copy of this updated manual is also being sent (at your request) to George Hamper, USEPA, Region V, Chicago, Illinois.

Please call me at 614-297-6043 if you have any questions concerning this submission.

Very truly yours,

William G. Ilg  
Environmental Coordinator  
COLUMBUS COATED FABRICS

WGI/175

Enclosure

*Received 6-1-89*  
*Edwin [Signature]*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

SEP 03 1985

MEMORANDUM

SUBJECT: Columbus Coated Fabrics  
Columbus, Ohio - OHD004-294-341  
Part B Permit Appeal

FROM: T. Daggett TD 9/3/85

TO: Addressees

Region V, U.S. EPA, issued the above referenced Part B Permit in October, 1984. The City of Columbus filed an appeal of this permit on November 2, 1985, arguing that the permittee had misrepresented that it had made arrangements with local emergency authorities in its permit application. After investigation of this claim, Region V issued its response to the petition on March 2, 1985, stating that it agreed with the petitioner, the City of Columbus. After Region V response was served on all parties, the permittee signed a written agreement with the petitioner committing to satisfy any outstanding concerns. Upon my inquiry, the City stated that it would continue to maintain its appeal until the written agreement was fully complied with by the permittee. (See my memorandum of July 15, 1985).

On August 26, 1985, I called Eileen Groves, Assistant City Attorney, to inquire whether the permittee had fully complied with its agreement. Ms. Groves stated that the permittee has now complied, the City's concerns have been satisfied, and it will withdraw its appeal. Later that day, I received the attached letter from Ms. Groves stating that the City's concerns have now been satisfied. I subsequently received the attached letter from Paulette Wolfson, serving as the Judicial Officer for this appeal, stating that she is closing the file on this matter.

CONCLUSION

The appeal process appears to have successfully prodded the permittee to satisfy the concerns for coordination from local emergency authorities.

Addressees:

C. Slaustas  
E. Ardiente  
D. Stringham  
B. Constantelos  
M. Elam  
M. Gade  
B. Magel  
R. Schaefer  
C. Klemme

GREGORY S. LASHUTKA  
CITY ATTORNEY  
CURTIS F. GANTZ  
FIRST ASSISTANT CITY ATTORNEY  
DONALD R. KELLER  
CHIEF LABOR LAW ATTORNEY  
PATRICK M. McGRATH  
CHIEF COUNSEL  
DONALD PLANK  
CHIEF REAL ESTATE ATTORNEY  
RONALD J. O'BRIEN  
CHIEF PROSECUTOR  
DEBORAH D. PRYCE  
FIRST ASSISTANT PROSECUTOR  
SCOT E. DEWHIRST  
DIRECTOR  
INTAKE/NIGHT PROSECUTOR PROGRAM  
D. EDGAR BARKELOO  
DAVID F. BECK  
ROBERT A. BELL  
DAVID M. BUCHMAN  
JAMES J. FAIS  
H. WILLIAM POLLITT, JR.  
SENIOR ASSISTANT CITY ATTORNEYS



## CITY OF COLUMBUS

### DEPARTMENT OF LAW

#### CIVIL DIVISION

90 West Broad Street  
Columbus, Ohio 43215  
614/222-7385

August 23, 1985

DANIEL W. DRAKE  
DEBORAH EVERSON  
MELINDA J. FRANK  
LAWRENCE A. GARLINGER  
BARBARA A. GATES  
EILEEN A. GROVES  
DEBORAH F. HOFFMAN  
DAVID W. INSLEY  
JOHN C. KLEIN  
ROBERT B. LEVERING  
JOYCE B. LINK  
MICHAEL C. MATUSKA  
MARCEE C. MCCREARY  
STEPHEN L. MCINTOSH  
LAWRENCE G. MUSCARELLA  
C. EILEEN PRUETT  
GUY L. REECE II  
MARVIN E. ROTHHAAR  
LISA L. SADLER  
MARCUS S. SHORE  
W. JAMES SIKI  
JEFFREY M. SMITH  
LAURA R. STITT  
DAVID E. TINGLEY  
JAMES D. VIETS  
ASSISTANT CITY ATTORNEYS

Tom Daggett  
U.S.E.P.A. - Region Five  
230 South Dearborn Street  
Chicago, Ill. 60604

Re: Columbus Coated Fabrics, Columbus, Ohio - OHD004-294-341

Dear Mr. Daggett:

The City of Columbus wishes to notify the U.S. EPA - Region Five that Columbus Coated Fabrics has now complied with the materials they indicated they would provide to the Columbus Fire Department and the Columbus Board of Health regarding the raw material safety data sheets. The Columbus Division of Fire completed familiarization tours of the Columbus Coated Fabric facility at 1280 North Grant on July 1, 2 and 3, 1985.

The City believes at this point in time with the accomplishments of these two events our objections and concerns regarding their application to the U.S. EPA for a Part B permit have now been satisfied. We again request that our memorandum of understanding with Columbus Coated Fabrics be attached as part of, and a condition of, any permit issued to Columbus Coated Fabrics.

Thank you very much for your continuing cooperation.

Very truly yours,

Eileen A. Groves  
Assistant City Attorney

EAG:klm

cc: Paulette Wolfson  
W. Bailey Barton  
Chief Stephen Woltz

0312m



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AUG 28 1985

OFFICE OF  
THE ADMINISTRATOR

Ms. Eileen A. Groves  
Assistant City Attorney  
City of Columbus  
Civil Division  
90 West Broad St.  
Columbus, OH 43215

Re: Columbus Coated Fabrics, Columbus, Ohio  
OHD-004-294-331  
RCRA 84-6

Dear Ms. Groves:

On August 27, 1985, I received your letter to Tom Daggett, U.S. EPA, Region V concerning Columbus Coated Fabrics. In your letter you state that Columbus has taken actions to familiarize local agencies with its operations. Therefore, the City no longer objects to the Region's decision to issue Columbus a RCRA permit. Based on your letter, there is no further need to consider the City's petition for review. Therefore, we are closing our files in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paulette Wolfson".

Paulette Wolfson  
Attorney/Advisor

cc: Tom Daggett  
U.S. EPA, Region V

W. Bailey Barton  
Columbus Coated Fabrics



City of Columbus  
Mayor Dana G. Rinehart

## Public Safety Department Fire Division

Don E. Werner, Jr.  
Fire Chief

RECEIVED  
MAR 15 1985  
WASTE MANAGEMENT  
BRANCH

March 12, 1985

Edith M. Ardiente, P.E.  
Chief, Technical Programs Section  
United States Environmental Protection Agency  
Region 5  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Receipt of Contingency Plan  
from Columbus Coated Fabrics  
1280 North Grant Avenue  
Columbus, Ohio

Dear Ms. Ardiente:

In your letter of January 18, 1985, you were interested in determining the approximate date on which the Division of Fire received a copy of Columbus Coated Fabrics' Hazardous Waste Contingency Plan, and when we received copies of revisions to the plan.

The answer to that inquiry is simple. The Division of Fire never received a copy of Columbus Coated Fabrics' Hazardous Waste Contingency Plan or any updates thereto. The first time we saw this plan was when we discovered it at the Columbus Public Library while reviewing Columbus Coated Fabrics' application prior to the July 25, 1984 public hearing. We did receive what Columbus Coated Fabrics called their "Spill Prevention Control and Counter-measures Plan and the Emergency Action Plan" on June 7, 1982. We did not receive updates or revisions to this plan at any time. It is important to note that the plan we did receive from Columbus Coated Fabrics did not deal with hazardous waste but rather mostly with the liquid hazardous materials that Columbus Coated Fabrics maintains on site to use in its manufacturing process.

Furthermore, we do not feel that either the plan that was submitted to us on June 7, 1982 or the plan that was submitted by Columbus Coated Fabrics for public review prior to the July 25, 1984 public hearing complies with Section 264.37 or 264.52 of 40 CFR. Section 264.37 reads in pertinent part as follows:

**Office of the Chief**

200 Greenlawn Avenue  
Columbus, Ohio 43223-2693  
(614) 222-7533

**Bureau of Fire Prevention**

300 North Fourth Street  
Columbus, Ohio 43215-2134  
(614) 222-7641

**Bureau of Training**

240 Greenlawn Avenue  
Columbus, Ohio 43223-2609  
(614) 222-6360

**Bureau of Maintenance**

270 Greenlawn Avenue  
Columbus, Ohio 43223-2609  
(614) 222-7416

**Medical Training Center**

739 West Third Avenue  
Columbus, Ohio 43212-3102  
(614) 222-7384

264.37 Arrangements with local authorities

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes;

(b) Where state or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.  
(emphasis added)

A fair reading of this section would place an affirmative duty on Columbus Coated Fabrics to attempt to make arrangements to familiarize the Division of Fire with the listed conditions. It is our contention and position that Columbus Coated Fabrics has never attempted to make these arrangements and they have not in fact taken place. Further we feel that if Columbus Coated Fabrics wishes to contest our position then the burden is on Columbus Coated Fabrics to produce the documentation of our refusal to enter into said arrangements.

Section 264.52 reads in pertinent part as follows:

264.52 Content of contingency plan.

(c) The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, pursuant to Section 264.37. (emphasis added)

This section seems to make it mandatory for the contingency plan to describe these agreements. Neither the June 7, 1982 nor the plan submitted for public review contain these agreements.

You also wanted information concerning the frequency and extent of visits to Columbus Coated Fabrics by members of our Division for either familiarization or inspection purposes.

After surveying two fire stations closest to Columbus Coated Fabrics I have learned that the fire companies at those stations have not made familiarization inspections at Columbus Coated Fabrics either on their own initiative or by invitation from Columbus Coated Fabrics, for at least the past four years.

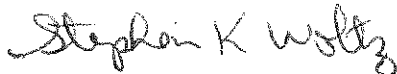
As for Fire Prevention inspections, prior to 1984 it was Division policy to inspect Columbus Coated Fabrics four times a year. In 1984 because of manpower shortages we now inspect all buildings only one time per year. After reviewing the records, I find that our inspection frequency fairly well adhered to our policy. However, I think it is important to distinguish between the type of inspection we made and the type required under 40 CFR. In the past we inspected only for violations of our Fire Prevention Code. We did not make inspection to gain knowledge about the hazardous waste process at Columbus Coated Fabrics nor were we invited to do so.

In addition our records indicate that from 1982 until the present the Division of Fire has responded to actual fires at Columbus Coated Fabrics on:

March 30, 1982  
September 23, 1982  
March 16, 1984  
May 2, 1984  
November 1, 1984  
November 17, 1984  
November 29, 1984

If you need any further information from the Division of Fire please contact me at (614)222-7641.

Very truly yours,



Stephen K. Woltz,  
Battalion Chief  
Fire Prevention Bureau

SKW/jlw



GRANT HOSPITAL

RECEIVED  
MAR 5 1985

WASTE MANAGEMENT  
BRANCH

March 1, 1985

U.S. Environmental Protection Agency  
Solid Waste Division  
Attn: Mr. Charles Slaustas  
230 South Dearborn Avenue  
Chicago, Illinois 60604

Dear Mr. Slaustas:

In response to your inquiry concerning our involvement with a contingency plan from the Columbus Coated Fabrics Company, I have been unable to locate any correspondence or plan they may have sent to us.

Grant Medical Center would be willing to assist with any type of contingency plan that would better our response to any incidents that may occur.

If you have any questions or need further assistance in this matter, please contact me at 614/461-3671.

Sincerely,

Brian Saul  
Fire/Safety Coordinator  
Grant Medical Center

BS/bap

cc: Gary Brown,  
Columbus Health Dept.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: JAN 07 1985

SUBJECT: Petition for Review of Final  
Permit Decision for  
Columbus Coated Fabrics,  
U.S. EPA ID No. OH04-294-351

FROM: Charles B. Slaustas

THRU: Daniel J. Banaszek

TO: Edith M. Ardiente, P.E.  
Chief, Technical Programs Section SHS-13

In response to your request dated January 2, 1985, attached are copies of pertinent background information regarding the above subject. Included among this information are copies of the following:

- 1) Mr. Michael J. Pompili's testimony at the public hearing held on July 15, 1984 (Item No. 041-53)
- 2) a newspaper article regarding the hearing (Item No. 041-61)
- 3) page 83b of the facility's Part B application
- 4) Record of Communication with the company (Item No. 041-60)
- 5) the Region's Response to Comments (Item No. 041-67)
- 6) page 63 of the facility's Part B application, which is also included in Attachment V-Contingency Plan, of the RCRA permit
- 7) a newspaper article regarding the appeal of the final permit decision
- 8) Certificate of Mailing (Item No. 041-69)

As a result of Mr. Pompili's comments at the public hearing, the facility's Part B application was researched further to determine the validity of his comments. With regard to his comment concerning whether a formal arrangement had been made by Columbus Coated Fabrics to familiarize police, fire and emergency response teams with the layout of the facility as well as fire and emergency evacuation routes at the facility, pages 63 and 83b of the application were considered to have addressed this issue. Specifically, page 83b states the following:

"In order to familiarize the local fire, police and hospitals on the properties of the wastes handled and the fire and emergency access routes, the contingency plan has been submitted to these aforementioned agencies. As any updates of the contingency plan, as (sic) initiated, they will be forwarded to these agencies".

...tion, page 03 of the application included the statement:

"The Columbus Fire Department inspects the facility once a year and checks out emergency equipment."

On September 10, 1984, I called the facility to inquire about the contingency plan included with the Part B application. The facility contact stated that the Columbus Fire Department was sent a copy of the contingency plan, and that a representative of the Fire Department visits the facility every six (6) months and walks through the plant.

Based on the above, a final decision was made to issue the permit and the Response to Comments included the above information.

The Agency does not possess independent knowledge regarding existence of any arrangement or agreement with the Fire Department. Instead, it has relied on the information contained in the Part B application, as well as that received during the September 10, 1984, telephone conversation. However, a letter will be sent to the Columbus Fire Department in order to obtain clarification regarding the degree of inspection and knowledge of the facility by the Fire Department.

Rather than initiate enforcement action or rescind the permit, clarification of the aforementioned issues should be obtained. In addition, the information and material requested by Paulette Wolfson in his letter of December 4, 1984, will be sent to the Judicial Officer of U.S. EPA by the suspense date.

One item which I wish to point out is that the Columbus Health Department sought a written agreement with Columbus Coated Fabrics. The agreement would specify that quarterly inspections be performed at the facility by the Columbus Fire Department, Columbus Health Department, or U.S. EPA. In addition, the agreement would specify that a health assessment survey of the surrounding community be conducted in the event of a fire or explosion. During the September 10, 1984, telephone conversation with the facility representative, I was told that such an agreement had not been signed by Columbus Coated Fabrics, and the probability of signature in the future seemed low. To date, we are unaware of any such agreement being reached.

5KW-13:C.Slaustas:jt:1/7/85

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	<i>J. Turner</i>	<i>CS</i>		<i>DJB</i>				
DATE	<i>1/7/84</i>	<i>1/7/84</i>		<i>1/7/84</i>				

SEP 28 1984

SHW-13

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William G. Ilg  
Senior Project Engineer  
Columbus Coated Fabrics  
P.O. Box 208  
Columbus, Ohio 43216

RE: Columbus Coated Fabrics  
Columbus, Ohio  
U.S. EPA ID # OH0 004-294-351

Dear Mr. Ilg:

Enclosed is a copy of the final Resource Conservation and Recovery Act (RCRA) permit for your proposed facility at the above-referenced location. The effective date of the permit, as issued, is the date indicated on the cover page of the permit.

The duration of the permit is ten (10) years. However, the United States Environmental Protection Agency may modify, revoke, reissue or terminate this permit based on causes specified in 40 Code of Federal Regulations (CFR) Section 270.40 and 270.41.

You have the right to appeal any condition of the permit pursuant to 40 CFR Section 124.19. The failure of your company to meet any portion of the permit could result in civil and/or criminal penalties.

Sincerely,

Basil G. Constantelos, Director  
Waste Management Division

Enclosure

cc: Steven White  
Ohio Environmental Protection Agency

Peggy Vinca  
Ohio Hazardous Waste Facility Approval Board

Mr. Thomas Heaton, Borden Inc.

SHW-13:C.Slaustas:jt:9/13/84

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
		<i>J. Turner</i>	<i>CS</i>				<i>WMB</i>	<i>KJK</i>	<i>WMD</i>
	<i>9/14/84</i>		<i>9/14/84</i>				<i>9/14/84</i>	<i>9/18/84</i>	<i>9/21/84</i>

*SHW-13*  
*9/25/84*

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

RE: Columbus Coated Fabrics  
Columbus, Ohio  
U.S. EPA ID# OHD 004-294-351

-Dear Sir/Madam:

On **SEP 27 1984**, the United States Environmental Protection Agency (U.S. EPA), Region V issued a Resource Conservation and Recovery Act (RCRA) hazardous waste management permit for the above-referenced facility.

This letter includes the Response to Comments, generated as a result of the public notice for the draft permit (Enclosure (1)). This response was prepared under 40 CFR 124.17(a) which requires the U.S. EPA to issue a response to comments at the time that any final permit decision is issued by the U.S. EPA, pursuant to 40 CFR 124.15.

I have made the final decision to issue a RCRA hazardous waste management facility permit to Columbus Coated Fabrics for its facility in Columbus, Ohio. Unless review is requested under 40 CFR 124.19, this final permit shall become effective 30 days after service of notice (Enclosure (2)).

The petition for review should be addressed to the Administrator of this Agency, but mailed to the attention of the Judicial Officer, in the following manner:

Mr. William Ruckelshaus  
Administrator, U.S. EPA  
Attn: Ronald McCallum (A-101)  
Judicial Officer  
401 M Street, S.W.  
Washington, D.C. 20460

042-68

On behalf of U.S. EPA, I wish to thank you for your interest in the draft permit for Columbus Coated Fabric S

Sincerely,

Basil G. Constantelos, Director  
Waste Management Division

Enclosures

cc: Steven White  
Ohio Environmental Protection Agency

5HW-13:C.Slaustas:jt:9/13/84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	
INITIALS	J. Turner	CS				WHL	KJK	DAS
DATE	9/13/84	9/14/84				9/14/84	9/18/84	9/27/84

9/28/84  
CSP  
9/27/84

On behalf of U.S. EPA, I wish to thank you for your interest in the draft permit for Columbus Coated Fabrics.

Sincerely,

Basil G. Constantelos, Director  
Waste Management Division

Enclosures

cc: Steven White  
Ohio Environmental Protection Agency

5HW-13:C.Slaustas:jt:9/13/84

Date:

SEP 27 1984

RESPONSE TO COMMENTS REGARDING THE RESOURCE  
CONSERVATION AND RECOVERY ACT (RCRA) HAZARDOUS WASTE MANAGEMENT  
FACILITY PERMIT TO BE ISSUED TO COLUMBUS COATED FABRICS  
COLUMBUS, OHIO

INTRODUCTION

This response is issued pursuant to 40 Code of Federal Regulations (CFR) Section 124.17, which requires that any changes of draft permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in this response be included in the administrative record.

The public comment period commenced June 20, 1984, with public notice in the Columbus Dispatch, as well as radio announcements on local stations. The notice and announcement requested public comments on the draft RCRA permit for Columbus Coated Fabrics. In addition, the public notice and radio announcement stated that a public hearing would be held on July 25, 1984, at the Columbus Public Library. As a result of requests from the public, the comment period was extended to August 27, 1984. In addition to the comments presented at the hearing, written comments were accepted through August 27, 1984.

COMMENTS AND RESPONSES

COMMENT

Some commenters stated that the facility's application lacked a written description of the type and amount of training given to persons occupying hazardous waste management positions.

RESPONSE

Review of the application indicates that job titles for positions at the facility which are related to hazardous waste management, as well as names of employees occupying various positions, are present. In addition, the application contains responsibilities and duties for various hazardous waste management positions. Also, descriptions of the type and amount of introductory and continuing hazardous waste training given to employees are present in the application. Therefore, the personnel training portion of the application satisfies the requirements of 40 CFR 264.16(d).

COMMENT

Some commenters stated that the Contingency Plan should include the arrangements agreed to by local police departments, fire departments, and hospitals.

RESPONSE

In order to familiarize the local fire, police, and hospital representatives with the properties of the hazardous waste handled by the facility, as well as fire and emergency evacuations routes at the facility, a copy of the contingency plan was submitted to each of these organizations by Columbus Coated Fabrics. In addition, any updates of the contingency plan will be forwarded to these organizations. Also, recent conversations between this Agency and representatives of Columbus Coated Fabrics indicated that members of the Columbus Fire Department visit the facility every six months for familiarization and/or inspection purposes. Since the provisions of 40 CFR 264.37 do not require that agreements be signed with the police and fire departments when a single police and single fire department might respond to an emergency, the regulatory requirements have been satisfied.

COMMENT

Some commenters stated that the facility's contingency plan should consider evacuation of residences and schools which are located within a kilometer of the facility.

RESPONSE

There is no regulatory requirement for Columbus Coated Fabrics to include an evacuation plan for residences and schools in its contingency plan. The requirements imposed by 40 CFR 264.51(b) were satisfied by the facility when it included an evacuation plan for facility personnel in its contingency plan.

COMMENT

One commenter expressed concerns about the facility's containment procedures in the event of a spill outside the hazardous waste storage building.

RESPONSE

The facility's contingency plan specifies that in the event of a spill of hazardous materials from one of the plating tanks (other than the cyanide tank), the drain into the sump would be plugged and the liquid will drain into the underfloor trench. Thus, eventual discharge into the sanitary sewer would be prevented. Afterwards, the liquid wastes would be pumped from the trench into drums by maintenance personnel. If the cyanide tank were the source of a spill, liquid would drain into the curbed area surrounding the tank. Afterwards, the liquid wastes would be pumped from the curbed area into drums.

In the case of a spill outside of the hazardous waste storage building, there are three locations at which sand and shovels are located for use in spill containment. In the case of entry of wastes into the storm sewer system, the City of Columbus would be notified; the outfall would be monitored, as necessary. The type and amount of available emergency equipment is considered sufficient. In addition, the procedures which would be implemented in the event of a spill are considered acceptable and proper.

COMMENT

Some commenters recommended that quarterly inspections be performed at the facility by Ohio EPA, U.S. EPA and/or the Columbus Health Department.

RESPONSE

Inspection on an annual basis by either the Ohio EPA Or this Agency is consistent with this Agency's guidance regarding inspections of facilities having an RCRA permit. There is no regulatory basis for including in the permit a requirement for a quarterly inspection of the facility by the Columbus Health Department or its representative.

COMMENT

Some commenters opposed issuance of the permit based on anxiety regarding storage of hazardous wastes in their community.

RESPONSE

Comments of this notice are not within the scope of RCRA regulations, which focus on technical design of the facility as well as proper procedures for safe operation and maintenance of the storage area.

COMMENT

A commenter questioned whether proper notice had been given regarding the date, time, and location of the public hearing held on July 25, 1984, concerning the draft RCRA permit.

RESPONSE

The Resource Conservation and Recovery Act requires the Agency to notice its intent to issue or deny a permit in a major local newspaper, to broadcast it over a local radio station, and to provide an opportunity for a public hearing. On June 20, 1984, U.S. EPA published a public notice in the Columbus Dispatch. The notice announced that a public hearing would be held on July 25, 1984, at the auditorium of the Columbus Public Library. The hearing would commence at 7:00 p.m. and would continue until all persons that had registered to speak have had an opportunity to present their comments for the record. In addition, the public notice announced the availability for public inspection of Columbus Coated Fabrics' permit application and draft RCRA permit. Radio stations WFRD-AM and WBNS-AM broadcasted a notice of the hearing on June 20, 1984. Thus, proper public notice of the Agency's intent to hold a public hearing on July 25, 1984 was done, and the requirements of 40 CFR 124.10(b) were met.

DETERMINATION

The United States Environmental Protection Agency (U.S. EPA) has determined that the permit will be issued without any change in permit conditions from those which were public noticed.



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

September 25, 1984

MEMORANDUM

FROM: Roger Grimes *Roger Grimes*  
Assistant Regional Counsel

TO: Mary A. Gade, Chief  
Solid Waste and Emergency Response Branch

SUBJECT: Review of RCRA Permit, Columbus Coated Fabrics

I have reviewed the attached permit and find that it is  
legally sufficient.

042-65

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: September 17, 1984

SUBJECT: Review of the Administrative Record  
Columbus Coated Fabrics Final Permit

FROM: Chris Christenson, Chief  
State Programs and Information Section

TO: Karl J. Klepitsch, Chief  
Waste Management Branch

Consistent with the agreement reached at the WMB/ORC meeting on April 25, 1984, I have reviewed the AR indicated above. I find the AR and the supporting documents in good order and consistent with the requirements of §124.9 and §124.18, and with established WMB procedures.

The materials should be submitted to the ORC.

cc: C. Slaustas  
M. Ohm

9/17/84  
OK  
KJK

012-64

<b>RECORD OF COMMUNICATION</b>		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY) _____	
(Record of item checked above)			
<b>TO:</b> William Ilg Columbus Coated Fabrics	<b>FROM:</b> Charles B. Staustas USEPA	<b>DATE</b> 9/10/84	<b>TIME</b> AM
<b>SUBJECT</b> Propose RCRA permit for facility			
<b>SUMMARY OF COMMUNICATION</b> <p>             This call was placed to inquire about the contingency plan included with the company's application for an RCRA permit. Specifically, I asked about the arrangements made with the fire department. Mr. Ilg stated that the Columbus Fire Dept was sent a copy of the contingency plan, and that a representative of the Fire Dept visits the facility every six (6) months and walks through the plant.           </p>			
<b>CONCLUSIONS, ACTION TAKEN OR REQUIRED</b>			
<b>INFORMATION COPIES TO:</b>			

CERTIFICATE OF MAILING

I Michael Ohm, a duly authorized representative of the United States Environmental Protection Agency, Region V, do hereby certify that on June 14, 1984, I placed in the United States mail, at the mail chute at 230 South Dearborn, the Draft Permit Decision for the Columbus Coated Fabrics facility in Columbus, Ohio. <sup>Columbus, Ohio</sup> The Draft Permit Decision was mailed to the persons specified on the attached mailing list.

Dated: 6/14/84

Michael Ohm

JUN 05 1984

5HW-13

Mr. Michael Pompili  
Columbus Health Department  
Environmental Health Division  
181 South Washington Boulevard  
Columbus, Ohio 43215

Dear Mr. Pompili:

Per the telephone conversation, between Mr. Gary Brown, of your staff, and Mr. Michael Ohm, of my staff, on June 27, 1984, regarding your letter received June 26, 1984, we are enclosing the permit applications, draft permits, and Statement of Basis and/or Fact Sheet for the following facilities:

Columbus Coated Fabrics  
Division of Borden, Inc.  
1280 North Grant Street  
Columbus, Ohio  
ID# OHD 004 294 351

Columbus Steel Drum Company  
1385 Blatt Boulevard  
Blacklick, Ohio  
ID# OHD 000 723 676

Furthermore, Mr. Ohm and Mr. Brown discussed your request to extend the date of the public hearing. Per Title 40 Code of Federal Regulations Section 124.10, we are required to give public notice of the public hearing date at least 30 days prior to the event. Since we would not be able to give adequate public notice regarding the date change for the public hearing, your request for an extension of the hearing date must be denied. Under Title 40 Code of Federal Regulations Section 124. , you may request an extension of the comment period.

Please feel free to call on us, if we can assist your review of the applications and draft permits. Contact Mr. Michael Ohm, at (312) 886-1657, regarding any general questions, and/or public notice issues specifically; or Mr. Charles Slaustas, at (312) 886-6190, regarding any technical issues.

041-48

Please also note that you may submit written comments up to the end of the respective comment periods, August 6, 1984, for Columbus Coated Fabrics, and August 10, 1984, for Columbus Steel Drum Company. We look forward to working with you.

Sincerely,

Judy Kertcher, Chief  
Regulatory Analysis and Information Unit

Enclosures

bcc: C. Christenson  
C. Slaustas  
A. Kawatachi, Acting RAIU Chief

Initials Date	Typist m/s 7/3/84	Author m/s 7/3/84	Other Staff	RAIU Chief [Signature] 7/3/84	SPIS Secy.	SPIS Chief	WMB Chief	WMD Director
------------------	-------------------------	-------------------------	----------------	--	---------------	---------------	--------------	-----------------

REGION V

DATE: JUN 1 1984

SUBJECT: Administrative Actions on Draft Permit for  
Columbus Coated Fabrics (Columbus, Ohio)

OH D 004 294 357

FROM: Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

TO: Chris Christenson, Chief  
State Programs and Information Section

I request that, for the above draft permit, the following actions be taken by the Regulatory Analysis and Information Unit.

1. Public notice EPA's preparation of the draft permit, allowing at least 45 days for public comment.
2. Public notice a public hearing, to be held no sooner than 30 days after the notice.

The above notice(s) must appear in a daily or weekly major local newspaper of general circulation, as well as being broadcast over a local radio station. Copies of the notice(s) must also be sent to the applicant, to persons and organizations on the current Region V mailing list, and to affected State and local governments/agencies, all as outlined in 40 CFR 124.10(c).

3. Double-check the completeness of the Part B docket file and forward to the Region V library.
4. Mail copies of the draft permit, fact sheet, public notice(s) and permit appeal procedures, to a public library near the facility.
5. In addition, mail a copy of the permit application to the applicable library.

The draft permit, fact sheet, permit application and docket file have already been hand-carried to Judy Kertcher of your staff. If you have any questions, please contact Charles Slaustas, the permit writer, at 6-6190.

5HW-13:C.Slaustas:jt:5.17/84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMB DIRECTOR
INITIALS	<i>J. Turner</i>	<i>CS</i>		<i>DJB</i>		<i>[Signature]</i>	<i>[Signature]</i>	
DATE	<i>5/24/84</i>	<i>5/24/84</i>		<i>5/29/84</i>		<i>5/29/84</i>	<i>5/31/84</i>	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: MAY 09 1984

SUBJECT: Comments on Draft RCRA Permit for  
Columbus Coated Fabrics,  
OHD 004-294-351

FROM: William H. Miner, Chief  
Technical, Permits & Compliance Section

ORIGINAL SIGNED BY  
WILLIAM H. MINER

TO: Mary A. Gade, Chief  
Solid Waste and Emergency Response Branch  
Office of Regional Counsel

This is in response to Mary Bryant's informal comments regarding the draft permit. We are addressing each comment that was made.

1. Roman numerals have been substituted for Arabic numbers on the cover page for each attachment.
2. The typographical errors on pages 1, 7, 8 and 11 of Attachment I have been corrected.
3. Condition II. I. 2. has been revised to include the provision that the Permittee has to maintain and distribute copies of the Contingency Plan.
4. In the Waste Analysis Plan, Stilson Labs does not check samples to determine if it is a listed waste because such wastes (F005) already have been identified by facility personnel.
5. After discussions with facility personnel, my staff has determined that Dust Stop Waste is not ignitable, but is EP Toxic. Therefore, Table I in the Waste Analysis Plan shows the Dust Stop Waste to be EP toxic, only.
6. In the Personnel Training Plan, page 100e mentions storage of 55 gallons in the Parker Street alley. The drums are temporarily stored at this location until a pallet of 4 drums is filled. Then, the pallet is moved to the hazardous waste storage building. The term "alley" is a misnomer because the temporary storage area is within the plant grounds, and not accessible to the public.
7. In addition, on page 100f of the Personnel Training Plan, there is mention of the Plating Sump area. Waste is removed from the sump area about three times per year. Approximately 5200 gallons of wastes were pumped from the sump to a tank truck last year.

041-29

8. Once again, in the Personnel Training Plan, mention is made of employees receiving training bi-annually. The company stated that this is meant to convey the fact that the training is given 2 times per year. However, one may receive the impression that the training is given once per two years. Therefore, the term "bi-annually" has been changed to "twice per year."
9. Mention is made in the Contingency Plan that the Hazardous Waste Storage Building is protected from fire by a wet sprinkler system. In addition, access is available to the facility's internal fire system. Also, a 15 lb CO2 fire extinguisher is located in the Storage Building. Thus, adequate fire protection is available.
10. Attachment VII, Description of Wastes, has been revised to reflect that Dust Stop Waste is EP toxic only, and not ignitable.

We appreciate your staff's review. Either you or a member of your staff may contact Charles Slaustas directly, at 6-6190, if there are any questions on this memorandum.

cc: Mary Bryant  
Assistant Regional Counsel (5C)

5HW-13:JTurner:PGrace:5-4-84

INITIALS

DATE

TYPIST

AUTHOR

STU #1  
CHIEF

STU #2  
CHIEF

STU #3  
CHIEF

5/2/84  
GMR

PK for  
5-4-84

5/7/84

DB  
5/7/84

5/8/84

<b>RECORD OF COMMUNICATION</b>		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> ELD TRIP <input type="checkbox"/> CONFERENCE	
		<input type="checkbox"/> OTHER (SPECIFY)	
TO: <i>The file</i>		FROM: <i>CB Houston</i>	
		DATE: <i>4/17/89</i>	
		TIME: <i>PM</i>	
SUBJECT: <i>Visit to Columbus Center Inc., 1280 North Hunt St, Columbus, Ohio</i>			
SUMMARY OF COMMUNICATION			
<p>           On this date, I visited the above facility and talked with both Mr. William Fly and Mr. Tom Heaton (a project engineer employed by Borden Chemical in Columbus. We discussed the comments which Mary Bryant of CDC made regarding the application, and I was able to resolve all of the comments.         </p> <p>           Afterwards, we toured the hazardous waste storage areas, as well as a few of the manufacturing areas.         </p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			

WASTE ANALYSIS PLAN

All waste shipped off site is determined by an inspection (consisting of a chemist and the hazardous waste coordinator) to be either possibly hazardous or definitely non-hazardous. The locations of the various waste streams were determined by interviews with all plant superintendents and determining all of the actual and possible waste dispositions from their respective areas of the plant.

1. The non-hazardous wastes are those known to either not be composed of toxic chemicals or not to have been in contact with any toxic material.

eg. Wood Scrap  
Cardboard Scrap  
Etc.

2. All other items are considered to be possibly hazardous.

A typical representative sample is obtained from the area in which the waste is generated according to instructions from Stilson Labs and as described in "Waste Analysis Section" - Pg. 37 and 38. This sample is sent to Stilson Laboratories, Columbus, for evaluation. Stilson Labs evaluates the sample for the four criteria required by RCRA - EP Toxicity, Corrosivity, Ignitability and Reactivity according to the "Test Methods for the Evaluation of Solid Waste, Physical Chemical Methods," SW-846 - (see letter Pg. 38b). Disposition of the waste is then handled according to the determinates of either being hazardous, non-hazardous, liquid or solid.

Possible new waste streams due to new and/or additional product developments are determined by the particular engineer involved with the project. Preliminary samples of the new waste stream are analyzed and after the decision is made as to the method of disposal, the final disposition is implemented by the hazardous waste coordinator.

If waste streams change, an analysis is performed in order to determine the proper disposal method for the landfill.

*Why is no check for volatile  
liquids?  
Facility is not equipped  
for this*

TABLE I

HAZARDOUS WASTE PARAMETERS AND RATIONALE

<u>Waste</u>	<u>Parameters</u>	<u>Rationale</u>
Still Bottoms (Solid & Liquid)	Ignitability E.P. Toxicity - Pb & Cd	This is a listed waste (F005), exhibiting ignitability and toxicity Pb and Cd.
Dust Stop Waste	EP Toxicity - Cadmium	Past analyses have identified only cadmium as exceeding EP toxic limits (D006).
Electroplating Sludge	EP Toxicity - Chromium	This is a listed waste - F006, chromium contaminated. No cyanides or reactive wastes are involved.
*Waste methylene chloride, 1, 1, 1 - trichloroethane	When generated: Methylene chloride 1, 1, 1 trichloroethane	This is a listed waste (F002).
*Waste cyclohexanone	When generated: cyclohexanone	This is a listed waste (F003).

\*Although these wastes have not been generated, the potential for future generation exists. If and when they are generated, the wastes will be tested for the parameters as listed.

- (d) The oil and residue that leaks from the Banbury dust stops into troughs must occasionally be scraped by the operator into a container designed to catch material.
- (e) When containers are full, the operator must dispose of the material into proper hazardous waste storage drums - 17E orange drums.
- (f) These 55 gallon drums are stored in the Parker Street alley adjacent to the Banbury rooms. *full on 2/20/83*
- (g) Operators will secure empty hazardous waste drums as required and position in Banbury rooms.
- (h) After the flow pans are full, they are emptied into 55-gallon hazardous waste drums. The material is allowed to sit idle over night and the oil then is removed from the top of each drum and put into a separate hazardous waste liquid drum.
- (i) When the solid and liquid drums are full, they are sealed, gasketed and a locking ring installed.
- (j) The drums are tagged and stenciled with proper tags and EPA numbers, palletized and taken to the hazardous waste storage building for storage.
- (k) The oil drums will have a "flammable liquid" label attached as well as a hazardous material label bearing the description of the waste, the date and the signature of the operator.

- (l) The drums with residue will have a flammable solid label attached as well as a hazardous material label bearing the description of the waste, date and the name of the operator.
- (m) Any spillage of hazardous waste is to be cleaned up immediately.
- (n) Any cleaning materials, such as rags, paper towels and floor dry, used in cleaning up spillages must be put into hazardous waste containers for proper disposal.
- (o) The drums of residue will have stencilled a CECOS Code Number 2471-C.
- (p) The drums of oil are shipped to SYSTECH with a Systech Waste Number of STC-14-2007.
- (x) Employees handling hazardous wastes in both these areas are furnished with work uniforms.
  - (a) If uniforms, due to a spill, become grossly contaminated, they are disposed of as a hazardous waste.
- (xi) Plating Sump Area *again 24*
  - (a) No CCF personnel directly handle this waste. *for 34*  
Hazardous Waste Contractor removes the waste from the pit with a suction hose into a tank truck. *34*

(xii) Implementation of Training Program

All current waste-handling personnel have been fully trained at the time of this submittal. In the future

2. SAFETY/SECURITY MANAGER

- a. Coordinate the loss control activities.

3. FIRST AID ATTENDANTS

- a. Direct all first aid activities.
- b. Keep records of casualties and disposition of injured employees.

4. PERSONNEL MANAGER

- a. Obtain authorization to coordinate arrangements for News Releases and Media inquiries.
- b. Ensure the notification of families of injured or hospitalized employees.

5. MAINTENANCE SUPERINTENDENT

- a. Ensure proper shut down of necessary equipment.
- b. Direct all emergency repair.

\*C. AREA 31 (see Pg. 67b & 67c) - HAZARDOUS WASTE STORAGE - CONTROL PROCEDURES  
FOR FIRES

- 1. The entire Hazardous Waste Storage Building is separate from the main factory complex by a concrete roadway in the west side and a concreted area approximately 15 ft wide on the north side.
- 2. The Hazardous Waste Storage Building is protected from fire by a wet sprinkler system. The sprinkler system heads are located for a coverage in excess of "high hazard protection" (a maximum of 69 sq ft of floor space per sprinkler head).
- 3. In addition to the sprinkler system, a 1½ inch, 75 foot wall mounted fire hose reel is available connected to the internal fire system of the facility. This is located directly across the roadway

all new personnel will complete this training program within 6 months of assignment to the hazardous waste storage facility or within 6 months of their date of employment, whichever is later. No employee hired to work at this facility will work unsupervised prior to completion of the training program.

Employees are required to meet bi-annually for review and update of this training program. Furthermore, the following subjects will be discussed and studied:

- (a) All hazardous wastes currently being handled at the facility, noting any changes in waste type, volume, source, characteristics, or location that have occurred during the past year.
- (b) The status of storage and operating conditions and procedures, noting any areas where there are problems or potential for problems. Employees participate in developing effective solutions.
- (c) The requirements contained in the facility's RCRA permit, noting any changes that have occurred during the past year. Areas where maintenance of compliance is a problem are identified and discussed, and effective solutions are sought.
- (d) Incidents that have occurred in the past year that warranted use of contingency plans and/or emergency action. This review focuses on the cause of the incident and identification of steps to be taken to prevent or to ensure better handling of such events in the future.

Records documenting the job title for each position,

*Columbus Coated —  
originals of  
Attachments*

MAR 28 1985

Ms. Paulette Wolfson  
Judicial Officer  
Office of the Administrator  
United States Environmental Protection  
Agency  
401 M Street, S.W.  
Washington, D.C. 20460

RE: Columbus Coated Fabrics  
Columbus, Ohio  
OHIO 804-294-341

Dear Ms. Wolfson:

In accordance with your December 4, 1984 letter, please find enclosed the following documents:

1. A copy of the draft permit.
2. A copy of the final permit.
3. A copy of Mr. Michael J. Pospilli's testimony at the public hearing held on July 15, 1984.
4. A copy of U.S. EPA's responses to comments.
5. A copy of the certificate of mailing by the Waste Management Division.
6. Page 83b of the facility's Part B application.
7. Page 63 of the facility's Part B application, which is also included in Attachment V-Contingency Plan, of the RCRA permit.
8. Record of communication with the facility dated September 10, 1984.
9. A January 18, 1985 letter from Region V to the Chief of Police, City of Columbus.
10. A January 18, 1985 letter from Region V to the Fire Chief, City of Columbus.

11. A January 18, 1985 letter from Region V to the Administrator, Grant Hospital, Columbus, Ohio.
12. A March 1, 1984 letter from Grant Hospital.
13. A March 12, 1985 letter from the Fire Division of the Public Safety Department of the City of Columbus.

Your letter requested that the Region V office submit its "response" to the issue raised in the petition for review of this permit. Simply stated, the Region V response to the issue is that we agree with the Petition for Review which stated that "... contrary to the statements made in the (Part B) application, no formal arrangement had been made by Columbus Coated Fabrics to familiarize police, fire and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility..., entrances to and roads within the facility nor possible evacuation routes." Our investigation, subsequent to the filing of the Petition for Review, has revealed that Columbus Coated Fabrics apparently did not follow through on its statements that it had supplied the various local entities with copies of its contingency plan.

Following receipt of a copy of the Petition and your letter of December 4, 1985, the Region sought to clarify whether Columbus Coated Fabrics did in fact notify the fire department, the hospital and the police department of its contingency plan and other information required under 40 CFR 264.53. Copies of our inquiry letters are attached to this letter (Attachments 9, 10, and 11). The responses to those inquiries are self explanatory (Attachments 12, and 13), but in summary, they seem to demonstrate that Columbus Coated Fabrics did not, in fact, seek to make any arrangements for emergency actions with any of the entities as it alleged in its public statements and in its Part B permit application.

Specifically, pages 63 and 83b of the Part B permit application seem to address these points:

"In order to familiarize the local fire, police and hospitals on the properties of the wastes handled and the fire and emergency access routes, the contingency plan has been submitted to these aforementioned agencies. As any updates of the contingency plan, as (sic) initiated, they will be forwarded to these agencies". (page 83b).

"The Columbus Fire Department inspects the facility once a year and checks out emergency equipment." (page 63).

This part B permit application was certified correct by the signature of W. Bailey Barton on behalf of the Company.

In summary, the Regional position relative to the issue brought up in the appeal is that we agree with the allegation made in the Petition.

Very truly yours,

Roger Grimes  
Assistant Regional Counsel

Enclosures

cc: Eileen A. Groves  
Assistant City Attorney  
City of Columbus

W. Barton Bailey  
Columbus Coated Fabrics

bcc: Chuck Slaustas  
Waste Management Division

GRIMES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: FEB 3 1984

SUBJECT: Draft RCRA Permit for  
Columbus Coated Fabrics,  
OHD 004-294-351

FROM: Charles B. Slaustas *cb*  
Technical, Permits & Compliance Section

TO: Mary A. Gade, Chief  
Solid Waste and Emergency Response Branch  
Office of Regional Counsel

*Fact Sheet*  
Enclosed are the ~~Statement of Basis~~ and draft RCRA permit conditions  
for Columbus Coated Fabrics in Columbus, Ohio. Please have one of  
your staff attorneys review these items and provide comments, if any,  
to me within five (5) working days of today's date. I may be con-  
tacted at 6-6173 if there are any questions.

6190

Enclosures

641-22



Re: Cols. Coated Fabrics

December 12, 1983

Mr. James Mayka  
State Implementation Officer  
U.S. EPA, Region V - 5HW-13  
230 South Dearborn St.  
Chicago, IL 60604

Dear Jim:

Attached please find the fact sheet and draft permit for Columbus Coated Fabrics. We have not included the attachments because U.S. EPA has a copy of the complete application. Please note that an additional submission should be expected from Columbus Coated Fabrics. Ohio EPA received this information on December 9, 1983. At the present time, we have not added any special terms and conditions to this permit.

If you have any questions concerning this fact sheet and draft permit, please call Karen Heyob at (614) 466-1588.

Yours truly,

A handwritten signature in cursive script that reads "Timothy A. Lawrence".

Timothy A. Lawrence, Mgr.  
Engineering Section  
Div. of Hazardous Materials Management

TL/kjl

cc: Tom Carlisle, TA&WMS, DHMM  
Tom Crepeau/file, P&MRS, DHMM  
Karen Heyob, ES, DHMM  
Lundy Adelsberger, CDO  
Chuck Slaustas, U.S. EPA, Region V

0533T

RECEIVED  
DEC 15 1983  
WASTE MANAGEMENT  
BRANCH

041-21

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



Federal Express

December 9, 1983

United States Environmental Protection Agency  
Region V  
111 West Jackson Blvd.  
Chicago, Illinois 60604

ATTENTION: Mr. Ken Shahn

RE: Ohio EPA Letter of  
November 7, 1983  
with Attachment

Franklin County Hazardous  
Waste Permit #01-25-0145

Dear Mr. Shahn:

Enclosed is a copy of the addendums and revisions to the Part B RCRA Permit application. This material was requested by the Ohio EPA, Division of Hazardous Materials Management.

The enclosed was delivered to the Ohio EPA on December 9, 1983.

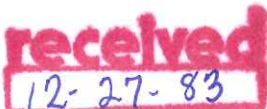
If there are any questions, please call me.

Very truly yours,

William G. Ilg  
Senior Project Engineer  
COLUMBUS COATED FABRICS  
Division of Borden Chemical,  
Borden Inc.

/db  
Enclosures

cc: S. Morris  
T. Heaton - Corporate Environmental



COPY



Re: Franklin County  
Hazardous Waste Permit  
01-25-0145

November 7, 1983

Mr. William Ilg, Senior Project Engineer  
Columbus Coated Fabrics  
P.O. Box 208  
Columbus, OH 43216

Dear Mr. Ilg:

The Division of Hazardous Materials Management has reviewed the revised Part B application submitted on September 30, 1983 for compliance with regulations published in 40 CFR Parts 270 and 264.

The attached sheet lists the adequacy comments that are the result of this review. Please provide information addressing these points in such form that the information can readily be inserted into the proper location within the permit application. Please send two copies of the requested information to Karen Heyob, Ohio EPA-DHMM and one copy to Ken Shahn, U.S. EPA, Region V, no later than November 14, 1983.

Since these comments are very limited, the Division of Hazardous Materials Management is preparing a draft permit for your facility to be sent to U.S. EPA, Region V. Adequate information addressing the adequacy comments must be submitted prior to issuance of the draft permit; otherwise, special terms and conditions will be incorporated into the permit addressing these points.

If you have any questions, please contact Karen Heyob at (614) 466-1588 or Lundy Adelsberger at (614) 462-8386.

Yours truly,

Paul Flanigan, Mgr.  
Engineering Section  
Div. of Hazardous Materials Management

PF/kjl

cc: Karen Heyob, ES, DHMM  
Lundy Adelsberger, CDO  
~~Ken Shahn, U.S. EPA, Region V~~

0425T

RECEIVED  
NOV 09 1983  
WASTE MANAGEMENT  
BRANCH

RECEIVED  
12/21/83

COLUMBUS COATED FABRICS  
COMMENTS

D. Process Information

1. A statement that aisle space sufficient for movement of emergency equipment (40 CFR 264.35) is maintained must be included.
2. Please address how liquids/solids in the sump in the hazardous waste storage building will be handled.

G. Contingency Plan

1. The local fire department and police department must be familiarized with properties of the wastes handled and fire and emergency access routes. The local hospital must be briefed on the health effects of wastes handled at the facility and the number of potential exposures. Please detail the arrangements made in accordance with 40 CFR 264.37.
2. The contingency plan must include a site plan showing the major structural features of the facility, including topography, adjacent land uses and adjacent land features (roads, bodies of water, streams, pipelines, utilities, etc.).
3. The contingency plan must identify the specific hazards (i.e., flammability, toxic gas, etc.) associated with the various types of waste handled at the facility [264.56(c)].
4. The contingency plan must identify the secondary hazards associated with the wastes handled, such as the generation of fumes [264.56(c)].
5. The contingency plan must detail all actions facility personnel will take in response to toxic fume or gas generation and contact with incompatible materials (264.56).
6. The contingency plan must include a list of emergency equipment, location, a physical description and an outline of the capabilities of the equipment [264.52(e)].
7. The contingency plan must provide for the monitoring of leaks, pressure buildup, gas generation, ruptures in pipes, valves or other process equipment when operations are stopped in response to a fire, explosion or release [264.56(f)].
8. The contingency plan must identify the resources that the emergency coordinator will have available to determine if the emergency situation presents a serious threat to human health both inside and outside of the facility.

9. The plan must contain provisions for the decontamination and renovation of all contaminated process equipment prior to resuming operations if applicable [264.56(g), 264.56(h), 264.56(i)].

H. Personnel Training

1. The personnel training plan must include job descriptions specifying the requisite skills for each position at the facility related to hazardous waste management in accordance with 264.16(d)(2).
2. Please explain how personnel are trained, relative to their job description in the use of emergency, key parameters for automatic waste feed cut off systems, communications or alarm systems, response to fires and explosions, response to groundwater contamination incidents and operations shutdown [264.16(2) and 264.16(3)].

I. Closure Plan

1. The closure plan must state an estimated year of closure [264.112(4)].
2. The closure schedule (Fig. 12, page 107) must distinguish between removal/disposal of the final volume of process hazardous waste and removal/disposal of cleanup waste inventory (264.113).

0426T

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



October 7, 1983

United States Environmental Protection Agency  
Region V  
111 West Jackson Blvd.  
Chicago, Illinois 60604

ATTENTION: Ms. Kathy Homer

RE: Ohio EPA Letter of  
August 30, 1983 with  
attachments

Franklin County Hazardous  
Waste Permit #01-25-0145

Dear Ms. Homer:

Enclosed is a copy of the addendums and revisions to the Part B RCRA Permit application. This material was requested by the Ohio EPA, Division of Hazardous Materials Management, after making their adequacy review.

The enclosed was sent to the Ohio EPA on September 30, 1983 in a timely manner.

If there are any questions, please call me.

Very truly yours,

William G. Ilg  
Senior Project Engineer  
COLUMBUS COATED FABRICS  
Division of Borden Chemical,  
Borden Inc.

/wi  
Enclosures

cc: S. Morris  
T. Heaton - Corporate Environmental

RECEIVED  
OCT 12 1983  
WASTE MANAGEMENT  
BRANCH

received  
10-19-83

COPY 2

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



September 30, 1983

Ohio Environmental Protection Agency  
Division of Hazardous Materials Management  
361 East Broad Street  
Columbus, Ohio 43216-1049

ATTENTION: Ms. Karen Heyob  
OEPA-DHMM

RE: Franklin County  
Hazardous Waste Permit  
#01-25-0145

Dear Ms. Heyob:

The following addendums, revisions and explanations are made to the Part "B" application as requested in P. Flanigan's letter of August 30, 1983 with attachment. The revised and addendum pages are enclosed.

## Part A

1. Pg. 12a, Revision 1.
2. Refer to Pg. 15, Revision 2.

## Hazardous Waste Analysis

1. Refer to Pg. 32b, Revision 2.

## Waste Analysis Plan

1. Refer to Pg. 37, Revision 2 and Pg. 38, Revision 2.
2. Refer to Pg. 15, Revision 2 and Pg. 40, Revision 3 for elimination of F009.
3. Refer to Pg. 38b, Revision 0; Pg. 38c, Revision 0; Pg. 38d, Revision 0; Pg. 38e, Revision 0; Pg. 38f, Revision 0; Pg. 38g, Revision 0; Pg. 38h, Revision 0; and Pg. 38i, Revision 0.
4. Refer to Pg. 39, Revision 1 and Pg. 40, Revision 3.

## Contingency Plan

1. New index - Pg. 49 a, Revision 0.
2. Refer to Pages 50 thru 57, Revision 1.
3. Refer to Pages 58 and 59, Revision 2 and Pages 60 thru 62, Revision 1.

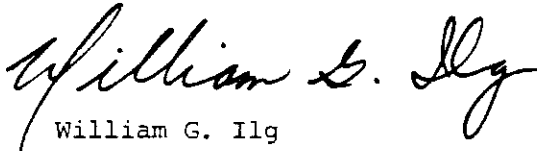
Ohio Environmental Protection Agency  
Ms. Karen Heyob  
September 30, 1983

Page - 2

4. Refer to Pages 63 thru 65, Revision 2 and Pg. 66, Revision 1.
5. Refer to Pg. 67 and 67a, Revision 2 and 67b thru 67d, Revision 1.
6. Refer to Pages 68, 69 and 70, Revision 1.
7. Refer to Pg. 71, Revision 2 and Pg. 72, Revision 1.
8. Refer to Pages 73 thru 83, Revision 1.
9. Refer to Pages 83a and 83b, Revision 1.

Please call if there are any questions.

Very truly yours,



William G. Ilg  
Sr. Project Engineer  
COLUMBUS COATED FABRICS  
Division of Borden Chemical,  
Borden Inc.

/db  
Enclosures

cc: S. Morris  
T. Heaton - Corp. Environmental

**COLUMBUS COATED FABRICS**  
Division of  
**BORDEN CHEMICAL, BORDEN INC.**



July 25, 1983

United States Environmental Protection Agency  
Region V  
111 West Jackson Blvd.  
Chicago, Illinois 60604

ATTENTION: Ms. Kathy Homer

RE: Ohio EPA Letter of  
June 6, 1983 with  
Attachments

Franklin County Hazardous Waste  
Permit #01-25-0145

Dear Ms. Homer:

Enclosed is a copy of the addendums and revisions to the Part B RCRA permit application. This material was requested by the Ohio EPA, Division of Hazardous Materials Management, after making their adequacy review.

The enclosed was sent to Ohio EPA on July 25, 1983 in a timely manner.

If there are any questions, please call me.

Very truly yours,

William G. Ilg  
Senior Project Engineer  
COLUMBUS COATED FABRICS  
Division of Borden Chemical,  
Borden Inc.

/db  
Enclosures

cc: S. Morris  
T. Heaton - Corporate Environmental





Re: Hazardous Waste Permit  
Application  
#01-25-0145

June 6, 1983

William G. Ilg  
Senior Project Engineer  
Columbus Coated Fabrics  
Borden Chemical, Borden Inc.  
1280 N. Grant Avenue  
Columbus, OH 43216

Dear Mr. Ilg:

This letter is to notify you that the Division of Hazardous Materials Management has reviewed the Part B permit application and supplemental information submitted by your facility. The application is now complete and essentially adequate, with the exception of the waste analysis section. Please submit additional information addressing the following comments:

- 1) Pages 32 - 36, Hazardous Waste Analyses, do not contain any explicit description of the listed hazardous waste F009. Please describe, in detail, the chemical physical analyses pertaining to the spent stripping and cleaning bath solutions from electroplating operations where cyanides are used (F009). Also, please review the hazardous waste listing descriptions in 40 CFR Part 261.31 in regards to your electroplating wastes where cyanides are used.
- 2) Please list and describe the sampling methods used to obtain a representative sample of each waste stream and which sampling protocol the method was chosen from, i.e. ASTM, SW 846 or equivalent protocol.
- 3) Page 40, Revision No. 1, Electroplating Sludge. Please clarify your rationale for listing F009, spent stripping and cleaning bath solutions from electroplating operations where cyanides are used, as an electroplating sludge.

Additionally, Columbus Coated Fabrics is using the financial test, as compiled by Borden Inc., to demonstrate compliance with the requirements for financial assurance for closure. This financial test must be updated annually, within 90 days after the close of each fiscal year. Similarly, the cost estimate for closure must be updated annually, within 30 days after each anniversary of the date on which the first closure cost estimate was prepared. These revisions must be performed prior to receiving a final permit, preferably before the public hearing. Therefore, please submit this documentation as soon as possible.

041-16

16 - JUN 1983

5HM-13

Paul Flanigan, Manager  
Engineering Section  
Division of Hazardous Materials Management  
Ohio Environmental Protection Agency  
361 East Broad Street  
P.O. Box 1049  
Columbus, Ohio 43216

RE: Borden Inc., Columbus Coated Fabrics  
Columbus, Ohio  
OHD 004 294 351

Dear Mr. Flanigan:

This is to acknowledge receipt of your May 27, 1983, "preliminary staff determination" relative to the above-referenced facility. Your determination that an extension of time is necessary for preparation of a draft permit is hereby accepted. We understand that you expect to forward a draft permit to us no later than June 15, 1983.

If you have any questions concerning the permit application, please contact Kathleen Homer at (312) 886-3718.

Sincerely

Daniel J. Banaszek, P.E., Chief  
Ohio/Minnesota Technical Unit  
Technical, Permits, and Compliance Section

bcc: Ken Westlake, Ohio SS  
Jim Mayka, Ohio SIO

	TYPIST	AUTHOR	STU #1	STU #2	STU #3	TPS	WMB	WMD
INITIALS	P.S.	KM/Homer	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	DIRECTOR
DATE	6/3/83	6/6/83		6/6/83				

**OhioEPA**

May 27, 1983

Jim Mayka  
U.S. EPA, Region V 5HR-13  
230 S. Dearborn St.  
Chicago, Illinois 60604

Dear Jim,

The Division of Hazardous Materials Management is currently completing the review of the Part B permit application submitted by Columbus Coated Fabrics. Our "preliminary staff determination" is that additional time will be required for the preparation of the draft permit. We expect that DHMM will be able to prepare a draft permit and forward it to U.S. EPA no later than June 15, 1983.

If you have any questions concerning the review of this application, please contact Karen Heyob at (614) 462-8411.

Yours truly,

*Paul Flanigan*

Paul Flanigan, Manager  
Engineering Section  
Division of Hazardous Materials Management

PF/maf

cc: Karen Heyob, ES, DHMM  
Tom Crepeau/File, P&MRS, DHMM  
Tom Carlisle, TA&WMS, DHMM  
Steve Rath/Lundy Adelsberger, CDO-DHMM  
Ken Westlake, U.S. EPA, Region V

*extension granted.  
K. Homer 6/2/83*

**RECEIVED**  
JUN 01 1983

**WASTE MANAGEMENT  
BRANCH**

041-15

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



RECEIVED

MAY 17 1983

WASTE MANAGEMENT BRANCH  
EPA, REGION V

May 12, 1983

United States Environmental Protection Agency  
Region V  
111 West Jackson Blvd.  
Chicago, Illinois 60604

ATTENTION: Ms. Kathy Homer

RE: Ohio EPA Letter of  
April 12, 1983 with  
Attachment

Franklin County Hazardous Waste  
Permit #01-25-0145

Dear Ms. Homer:

Enclosed is a copy of the addendums and revisions to the Part B RCRA permit application. This material was requested by Ohio EPA, Division of Hazardous Materials Management, after making their adequacy review.

The enclosed was sent to Ohio EPA on May 12, 1983 in a timely manner.

If there are any questions, please call me.

Very truly yours,

William G. Ilg  
Senior Project Engineer  
COLUMBUS COATED FABRICS  
Division of Borden Chemical,  
Borden Inc.

/db  
Enclosures

cc: S. Morris  
T. Heaton - Corporate Environmental

received  
5-17-83

COPY 9



Re: Franklin County  
Hazardous Waste Permit  
#01-25-0145

April 12, 1983

Mr. William Ilg, Senior Project Engineer  
Columbus Coated Fabrics  
P.O. Box 208  
Columbus, OH 43216

RECEIVED  
APR 15 1983

WASTE MANAGEMENT  
BRANCH

Dear Mr. Ilg:

The Division of Hazardous Materials Management has conducted an adequacy review of the Part B permit application submitted by your facility. This application was reviewed pursuant to regulations published in 40 CFR Parts 122.25 and 124.3 and Part 264.

As indicated on the attached comment sheet, some parts of the application were found to be inadequate. Please provide detailed information addressing all areas indicated on the comment sheet in such form that the information can be readily inserted into the proper location within the permit application. Please send two copies of the requested information to Karen Heyob, Ohio EPA-DHMM and one copy to Kathy Homer, U.S. EPA, Region V within approximately 3 weeks, but no later than May 6, 1983.

If you have any questions about our review, please contact Karen Heyob at (614) 462-8415.

Yours truly,

Paul Flanigan, Manager  
Engineering Section  
Div. of Hazardous Materials Management

PF/kh/kjl

cc: Tom Carlisle  
Steve Rath/Lundy Adelsberger  
Kathy Homer  
Tom Crepeau  
Karen Heyob

041-11

COLUMBUS COATED FABRICS  
ADEQUACY REVIEW COMMENTS

Part A

1. Part 3, pg. 3 of 5, Section IX, line 7: The unit code should be converted to either pounds or tons.
2. Are there any changes in Part 1 of the Part A application? If so, a revised Part 1 should be submitted.

B. Facility Description

1. Please provide additional information about the CCC and St. Louis R.R. land lease. How long will the lease be in effect? What is the use of leased land? What is the distance from the hazardous waste storage area to the property line?
2. What is the load-bearing capacity of the reinforced concrete roadways within the facility? Is the maximum loaded weight of any tractor/trailer leaving the facility 60,000 lbs.?

C. Waste Analysis Plan

1. Please comment on the following discrepancy between the Part A permit and the Part B application. The Part A permit includes F001, F002, F003 and F009 listed hazardous wastes. However, these wastes are not identified in either the Chemical and Physical Analyses section or in the Waste Analysis Plan of the Part B application.
2. EP toxicity should be included in the list of parameters chosen for analysis of the still bottoms (page 40).
3. A description of the test methods used to test for the chosen parameter and a list of the sampling methods used to obtain a representative sampling of each waste stream must be included in the Waste Analysis Plan.

D. Process Information

1. Are containers labeled as required by 49 CFR Part 172 prior to shipment off-site?
2. Figure 5 should include dimensioning of the actual hazardous waste storage area. Is the entire building to be designated as a hazardous waste storage area or only a certain portion of it? Figure 5 should also include the layout of the container arrangement showing separation and aisle spacing distances and the location of various waste types. Clearly show storage locations of ignitable, reactive or incompatible wastes.
3. Are containers ever reopened to add or remove waste?
4. What is the thickness of the reinforced concrete pad?
5. Is the concrete pad compatible with the hazardous wastes and raw materials being stored on it?
6. Please describe how spilled or leaked waste will be removed from the collection area and sump in as timely a manner as necessary to prevent overflow of the collection system. What equipment will be necessary? What is the ultimate fate of such liquids removed from the containment system?

F. Procedures to Prevent Hazards

1. The facility must provide a copy of the inspection schedule. State that the inspection schedule will be kept at the facility. The schedule should be broken down into general inspection requirements and specific process inspection requirements. The general inspection requirements include inspection of the safety, emergency and security equipment and monitoring, operating and structural equipment. This should include, for example, respirators, alarm and communication systems, decontamination equipment, fences, lock in devices, etc.

The inspection schedule must identify the types of problems to be looked for during the inspection. These should be specific to the piece of equipment being inspected. Additionally, the schedule must identify the frequency of inspection of the items on the schedule.

2. An inspection schedule for container storage areas and loading-unloading dock areas should be included. The schedule should indicate specific items inspected and types of problems looked for.
3. Section 8, Procedures and Equipment for Hazard Abatement, Part iii(b) should be reworded. Is all drum handling, as well as drum hauling, conducted on impervious reinforced concrete?
4. Are facility personnel given information about the major chemical components of the wastes handled at the facility and the hazards associated with them? Does the available protective equipment satisfy the OSHA requirements? Are personnel trained in the correct use of available personal protection equipment?
5. Are any reactive wastes stored at the facility?
6. Are "No Smoking" signs posted at the facility? Are sparkproof tools used on all containers.

G. Contingency Plan

1. The Contingency Plan should begin by providing the name and location of the facility. It should also include a description of facility operations. The included site plan Pages 62, 63, 64 and 65 is extremely difficult to understand.
2. Emergency coordinators listed on Page 60 and 60a are not in agreement, specifically S.E. Lizer and Dewey Bibb.
3. The contingency plan does not provide adequate guidance to the emergency coordinator in regards to decision-making criteria for implementation of the plan.
4. The contingency plan must clearly define the method and circumstances of initial emergency coordinator notification. The plan must also define the sequence of actions the emergency coordinator will take in the event of an emergency.
5. The plan must describe procedures for identification of hazardous materials involved in the emergency.
6. The plan must state the policy for assessment of possible hazards to the environment and human health and the need for evacuation of residents.
7. The plan must describe procedures for ensuring that all emergency equipment used during an emergency are clean and fit for reuse before operations are resumed.

8. The planned response to container and tank spills and/or leakage is extremely sketchy and inadequate with regard to:
  - a. Emergency Coordinator's procedure for responding to an emergency;
  - b. Availability of equipment and personnel to be used as cleanup resources;
  - c. Procedures for the management and disposal of spilled or leaked waste and the ensuing decontamination process.
9. The contingency plan must give the location, description and capabilities of all emergency equipment available.

I. Closure Plan

1. The Part B application must specify an anticipated year of closure.
2. Please submit an updated copy of the financial mechanism.

MAR 02 1983

William G. Ilg  
Senior Project Engineer  
Columbus Coated Fabrics  
Borden Chemical, Borden Inc.  
1280 N. Grant Avenue  
Columbus, Ohio 43216

RE: Columbus Coated Fabrics  
Columbus, Ohio  
EPA ID #: OHD 004-294-351 ✓

Dear Mr. Ilg:

This letter is to notify you, as required by 40 CFR 124.3(c), that we have reviewed your Part B permit application and have now determined your permit application to be complete. This determination means only that all items required by 40 CFR 122.25 have been addressed.

We now begin an "adequacy review", during which we analyze the technical aspects of the application, in-depth, in order to make a tentative decision to either prepare a draft permit or deny the application. We will be working cooperatively with the Ohio Environmental Protection Agency (OEPA) throughout the course of this review. Please understand that either, or both, of our agencies may request additional information from you, if it is necessary to clarify, modify, or supplement previously submitted material. Timely response on your part to any such requests should allow us to advise you of our tentative decision within 120 days of today's date.

Subsequent to that decision, either a draft permit or a "notice of intent to deny" will be publicly noticed and made available for public comment, with an opportunity provided for a public hearing. After the close of the public comment period, our Agency will issue a final permit decision.

Please contact Ms. Kathleen Homer of my staff, at (312) 886-3718, if you have further questions.

Sincerely yours,

William H. Miner, Chief  
Technical, Permits and Compliance Section  
Waste Management Branch

cc: Paul Flanigan, Ohio EPA

5HM-13:Kathy Homer:pg:3-2-83

041-9

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WM DIR
		<i>[Signature]</i> 3/2/83	<i>[Signature]</i> 3/2/83		<i>[Signature]</i> 3/2/83		<i>[Signature]</i> 3/2/83		

MAR 02 1983

Tom Crepeau, Chief  
Permits and Manifest Records Section  
Division of Hazardous Materials Management  
Ohio Environmental Protection Agency  
361 East Broad Street, P.O. Box 1049  
Columbus, Ohio 43216

RE: Columbus Coated Fabrics  
Columbus, Ohio  
EPA ID #: OHD 004-294-351 ✓

Dear Mr. Crepeau:

We have determined that the RCRA Part B permit application for the above-referenced facility is complete. We are enclosing a copy of our letter to the facility advising them of this determination. Additional information provided by the facility by letter of February 4, 1983, was previously forwarded to you, and discussed with technical staff in your Agency, prior to our determination.

We ask that you perform a detailed technical evaluation of the application materials to ensure conformance with all applicable 40 CFR Part 264 standards. Please submit a "preliminary staff determination" (PSD) to us by May 16, 1983. The PSD should contain (a) a draft permit, (b) a "notice of intent to deny", or (c) a determination, with justification, that an additional specified period of time is necessary to complete the evaluation. The PSD should also include a fact sheet, or statement of basis, as appropriate.

Please contact Ms. Kathleen Homer, the responsible person on my staff, at (312) 886-3718, if you have any questions.

Sincerely yours,

William H. Miner, Chief  
Technical, Permits and Compliance Section  
Waste Management Branch

Enclosure

cc: Paul Flanigan, Ohio EPA

bcc: Ken Westlake, Ohio SS

5HW-13:Kathy Homer:pg:3-2-83

INITIALS *PS* *3/2/83* *KW* *3/2/83* *for* *KPS* *3/2/83* *WMB* *3/2/83* *WMD*  
DATE *3/2/83* *3/2/83* *3/2/83* *3/2/83* *3/2/83* *3/2/83* *3/2/83*

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



February 4, 1983

United States Environmental Protection Agency  
Region V  
111 West Jackson Blvd.  
Chicago, Illinois 60604

ATTENTION: Mr. William H. Miner, Chief  
Technical, Permits and Compliance Section

ATTENTION: 5HW-TUB

RE: OHDOO4294351  
Columbus Coated Fabrics  
Columbus, Ohio

Dear Mr. Miner:

The following addendums, revisions and explanations are made to the Part "B" application as requested in your letter of 12/2/82. The revised and addendum pages are enclosed.

Comment #1 - Refer to revisions Pg. 32 (revised) and sheets 32a, 32b and 32c.

Comment #2, 3 & 4 - Refer to pages 127 thru 130a revised and addendums and pages #70 and 71 for explanation of means of removing accumulated liquids to prevent overflow.

Refer to page 37, section (iv) - documenting tests for free liquids.

Comment #5 - Refer to page 45, revision 1, section (i) - a and b.

Comment #6 - Refer to page 45, revision 1, 46, 47 and 47a.

Comment #7 - Refer to inspection log, page 47a.

Comment #8 - Refer to page 127, revision 1, section (1), (i), (A).

Comment #9 - No incompatible wastes are stored. See page 130, revised, section (iv) and (v) and page 87 revised, section (iv) and Pg. 128, Rev., Sec. (c).

Comment #10 - Refer to pages 59, 60 and 60a.

Comment #11 - Refer to Contingency Plan, page 56 and page 69.

Comment #12 - Refer to Contingency Plan, page 69.

Comment #13 - Refer to page 83b, c, d, e, f, g, h and i for evidence of submission of Spill Prevention & Countermeasures Plan and Emergency Action Plan to the required authorities.

RECEIVED  
FEB 09 1983

WASTE MANAGEMENT  
BRANCH

RECEIVED  
2/10/83

United States  
Environmental Protection Agency  
Region V  
Attention: Mr. William H. Miner, Chief  
Technical, Permits and Compliance Section

February 4, 1983  
Page - 2

Comment #14 - Refer to page 83a.

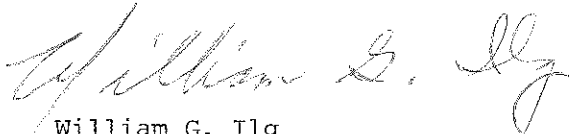
Comment #15 - Refer to pages 91 thru 100g and page 107, revised.

Comment #16 - The closure date is referred to on page 101, section 13, (i).

As noted, since this manufacturing facility has no plans to close, no closing date can be projected.

Please call me if there are any questions.

Very truly yours,



William G. Ilg  
Senior Project Engineer  
COLUMBUS COATED FABRICS  
Division of Borden Chemical,  
Borden Inc.

/db  
Enclosures

cc: S. Morris  
T. Heaton - Corp. Environmental



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

DEC 2 1982

REPLY TO ATTENTION OF:

5HW-TUB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William G. Ilg  
Senior Project Engineer  
Columbus Coated Fabrics  
P.O. Box 208  
Columbus, Ohio 43216

RE: OHD004294351  
Columbus Coated Fabrics  
Columbus, Ohio

Dear Mr. Ilg:

Thank you for sending the Part B of your Resource Conservation and Recovery Act (RCRA) permit application for your facility.

This letter is to notify you, pursuant to 40 CFR 124.3, that we have conducted an administrative review of the application for completeness, (but not technical adequacy), and have found several items missing. Attached is the permit application checklist, which lists all items required in the RCRA permit application. We have checked whether each required item was provided, not provided, or not applicable. Where the application contained a required item, the blank marked "provided" was checked and the permit application page number indicated in the comments section. In addition, general review comments are shown on the attachment. This checklist and comment attachment has been coordinated with the Ohio Environmental Protection Agency (OEPA).

Your response is due within 60 days after receipt of this letter. Please contact Ms. Kathleen Homer of my staff at (312) 886-3718, if you should have any questions about the review, or need assistance.

Sincerely,

*Daniel J. Banaszek for*  
William H. Miner, Chief  
Technical, Permits and Compliance Section

Enclosure

cc: Karen Heyob, OEPA  
Tom Crepeau, OEPA

Part A file  
Ken westlake

Certified  
4591345963

012/1/82

SNW-TUB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William G. Ilg  
Senior Project Engineer  
Columbus Coated Fabrics  
P.O. Box 200  
Columbus, Ohio 43216

RE: OHDO004294361  
Columbus Coated Fabrics  
Columbus Ohio

Dear Mr. Ilg:

Thank you for sending the Part B of your Resource Conservation and Recovery Act (RCRA) permit application for your facility.

This letter is to notify you, pursuant to 40 CFR 124.3, that we have conducted an administrative review of the application for completeness. (but not technical adequacy) and have found several items missing. Attached is the permit application checklist, which lists all items required in the RCRA permit application. We have checked whether each required item was provided, not provided, or not applicable. Where the application contained a required item, the blank marked "provided" was checked and the permit application page number indicated in the comments section. In addition, general review comments are shown on the attachment. This checklist and comment attachment has been coordinated with the Ohio Environmental Protection Agency (OEPA).

Your response is due within 60 days after receipt of this letter. Please contact Ms. Kathleen Moser of my staff at (312) 866-3718. If you should have any questions about the review, or need assistance.

Sincerely,

William H. Miner, Chief  
Technical Permits and Compliance Section

Enclosure

cc: Karen Hayob, OEPA + Tom Crepeau, OEPA  
bcc: Part A file  
Ken Westlake

041-5



Re: Franklin County  
Hazardous Waste  
Permit #01-25-0145

November 10, 1982

RECEIVED

NOV 15 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

Kathy Homer, State Implementation Officer  
U.S. EPA, Region V  
Waste Management Branch  
230 South Dearborn Street  
Chicago, IL 60604

Dear Kathy:

The Division of Hazardous Materials Management has conducted an administrative review of the Part B permit application submitted by Columbus Coated Fabrics. This application was reviewed for completeness pursuant to regulations published in 40 CFR Parts 122.25 and 124.3 and 40 CFR Part 264.

As indicated in the attached completeness checklist, several required items were not included. A brief discussion of the deficiencies found is included in the comments section attached to the checklist.

If you have any questions about our review, please feel free to contact Karen Heyob at (614) 462-8415.

Yours truly,

Paul Flanigan, Manager  
Engineering Section  
Div. of Hazardous Materials Management

PF/kh/kjl

Attachment

cc: Chuck Wilhelm, Chief, DHMM  
Steve Rath, CDO  
Tom Carlisle, TA&WMS, DHMM  
Tom Crepeau/file, P&MRS, DHMM  
Martha Gibbons, DHMM  
Karen Heyob, ES, DHMM

COLUMBUS COATED FABRICS  
PERMIT APPLICATION COMMENTS  
PAGE 2

13. Please include evidence and a description of coordination agreements with local police and fire departments and hospitals. [40 CFR 264.52(c) and 264.37]
14. Provisions for submission of reports of emergency incidents within 15 days of occurrence and maintenance of required records must be included with the Part B application. [40 CFR Part 264.56(j)]
15. The outline of the personnel training program must include:
  - a) a description of the content, frequency and technique used in introductory and continuing training;
  - b) demonstration that the training director is trained in hazardous waste;
  - c) demonstration that training is relevant to job position;
  - d) demonstration that facility personnel are familiar with emergency procedures, emergency equipment and emergency systems; and
  - e) indication that training is successfully completed by facility personnel within 6 months of employment or assignment to a facility or transfer to a new position at the facility. [40 CFR Parts 122.25(a)(12), 264.16(c), 264.16(d)(3), 264.16(a)(2), 264.16(l), 264.16(a)(3), 264.16(d)(4) and 264.16(b)]
16. Please include an estimated year of closure and an estimate of the time period which will be required for each closure step. [40 CFR 122.25(a)(13), 264.113(a) and 264.113(b)]

COLUMBUS COATED FABRICS  
PERMIT APPLICATION COMMENTS

1. Please include a general description of each waste stream listed on the Part A permit. The description should include the source of the waste, the hazard characteristics, the basis for hazardous designation and chemical and physical analyses of the waste. [40 CFR Parts 122.25(a)(2) and 264.13(a)]
2. A description of the primary containment devices used at the facility including design parameters, dimensions, materials of construction and evaluation of compatibility with wastes stored must be included. [40 CFR Parts 122.25(b)(1)(i)(A), 264.171 and 264.172]
3. Please include a description of container management practices used to ensure that containers are always kept closed during storage and that containers are not handled in a manner that could cause them to leak. [40 CFR Parts 122.25(b)(1)(i)(A) and 264.173]
4. For containers of hazardous waste that do not contain free liquids, documentation must be provided to show that these wastes do not contain free liquids. [40 CFR 122.25(b)(1)(ii)(A)]
5. The application must include an inspection schedule for security devices, monitoring devices, safety, emergency, operating and structural equipment. This schedule must identify the types of problems to be looked for during inspection and the frequency of inspection. [40 CFR Parts 122.25(a)(5), 264.15 and 264.33]
6. Please include an inspection schedule for the container storage area. This should include problems to be looked for and indicate that inspections are completed on a weekly basis. Also, please describe methods used to detect leaking containers. [40 CFR 264.179]
7. The inspection log must include the time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs made. The inspection log submitted with this application appears to be primarily a drum (waste) inventory and not readily applicable as an inspection log. [40 CFR 264.15(d)]
8. Please include a demonstration that containers of ignitable wastes are stored at least 50 feet from the property line. It is not clear from the facility drawing that the entire hazardous waste storage building is greater than 50 feet from the property line. Please indicate which areas of the hazardous waste storage building are used to store hazardous waste. [40 CFR 122.26(b)(1)(ii) and 264.176]
9. If incompatible wastes are stored at the facility, please include a description of management practices to ensure that incompatible wastes are not placed in the same container and that separate containers of incompatible wastes are separated by the use of the dike, berms, walls or other devices. [40 CFR 122.25(b)(1)(iii) and 264.177]
10. Please include names of designated alternate emergency coordinators. Also, a statement of authorization of the emergency coordinator to commit the necessary resources to implement the contingency plan is required. [40 CFR Parts 264.52(a) and 264.56(b)]
11. A list of criteria for implementation of the contingency plan must be included with the contingency plan. [40 CFR Parts 264.52(a) and 264.56(b)]
12. Please include the location, description and capabilities of emergency equipment. [40 CFR Part 264.52(e)]

PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
C-2b	Description of the test methods used	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 37-38, 39</u>
C-2c	Description of the sampling methods used	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 37</u>
C-2d	Description of frequency of analyses	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 37, 39</u>
C-2e	Description of inspection of off-site generated wastes	<u>          </u>	<u>          </u>	<u>X</u>	<u>          </u>
<b>D. PROCESS INFORMATION</b>					
D-1	Containers				
D-1a	Containers with free liquids				
D-1a(1)	Primary containment devices: a description of basic design parameters, dimensions, construction materials, and demonstration of compatibility of waste with containers	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #2, p. 130</u>
D-1a(2)	Description of container management practices (opening, handling, and storage procedures) to insure container integrity	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #3</u>
D-1a(3)	Design and operation specifications for secondary containment system including a drawing of all the design aspects of the containment system and:				
D-1a(3)(a)	Demonstration of structural integrity of base underlying containers, and ability of bases to contain spills, leaks, and accumulated precipitation	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 127</u>
D-1a(3)(b)	Description of how containment system design promotes drainage or how containers are kept from contact with free standing liquids	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 128</u>
D-1a(3)(c)	Description of containment system capacity relative to the number and volume of containers to be stored	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 129</u>
D-1a(3)(d)	Description of containment system provisions for preventing or managing run-on	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 128</u>
D-1a(4)	Description of containment system means of analyzing and removing accumulated liquids to prevent overflow	<u>          </u>	<u>X</u>	<u>          </u>	<u>p. 127</u>
D-1b	Containers without free liquid				
D-1b(1)	Documentation/information showing that the wastes do not contain free liquids	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #4, p. 129</u>
D-1b(2)	Primary containment devices: a description of basic design parameters, dimensions, construction materials, and demonstration of compatibility of waste with containers	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #2, p. 130</u>

PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
D-1b(3)	Description of container management practices (opening, handling, and storage procedures) to insure container integrity	<u>          </u>	<u>  X  </u>	<u>          </u>	<u>Comment #3</u>
D-1b(4)	Containment system: a description of how design promotes drainage and removal of precipitation or how containers are kept from contact with free standing liquids	<u>  X  </u>	<u>          </u>	<u>          </u>	<u>p. 128</u>
D-2	Tanks				
D-2a	References to design standards or other available information used in tank design construction, and information about tank dimensions, capacity, and shell thickness	<u>          </u>	<u>          </u>	<u>  X  </u>	<u>          </u>
D-2b	Description of design specifications including identification of construction and lining materials for assessment of corrosion and erosion potential	<u>          </u>	<u>          </u>	<u>  X  </u>	<u>          </u>
D-2c	Diagram of piping, instrumentation, and process flow, and a description of feed systems, safety cut-off, bypass systems, and pressure controls (e.g., vents)	<u>          </u>	<u>          </u>	<u>  X  </u>	<u>          </u>
D-3	Waste piles				
D-3a	Waste piles with free liquids				
D-3a(1)	Description of practices to control wind dispersal of hazardous waste	<u>          </u>	<u>          </u>	<u>  X  </u>	<u>          </u>
D-3a(2)	Description of measures to divert run-on away from the pile	<u>          </u>	<u>          </u>	<u>  X  </u>	<u>          </u>
D-3a(3)	Description of the leachate and run-off collection and control system. Includes a description of design and operating procedures to properly manage and dispose of any leachate that is a hazardous waste	<u>          </u>	<u>          </u>	<u>  X  </u>	<u>          </u>
D-3a(4)	Description of the foundation supporting the base	<u>          </u>	<u>          </u>	<u>  X  </u>	<u>          </u>
D-3a(5)	Waste pile base				
D-3a(5)(a)	Design specifications of the pile base and containment system (or liners) that includes estimated containment life of the base, the permeability of the liner(s), and the estimated life of the hazardous waste pile. Information on the characteristics of the waste or leachate to which the liners are exposed, or:	<u>          </u>	<u>          </u>	<u>  X  </u>	<u>          </u>



PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
F-2a	A copy of the general inspection schedule for security devices and monitoring, safety, emergency, operating, and structural equipment				
F-1a(1)	Identification of the types of problems to be inspected		X		Comment #5
F-2a(2)	Identification of the frequency of inspection		X		Comment #5
F-2b	Description of specific process inspection requirements				
F-2b(1)	Description of procedures and schedule for specific requirements for containers		X		Comment #6
F-2b(2)	Description of procedures and schedule for specific requirements for tanks			X	
F-2b(3)	Description of procedures and schedule for specific requirements for waste piles			X	
F-2c	Description of procedures for ensuring that remedial action is taken when inspections reveal problems	X			
F-2d	A copy of the inspection log	X			Comment #7, p. 47
F-3	Request for waivers of preparedness and prevention requirements				
F-3a	Request for waiver of the equipment requirements			X	
F-3b	Requests for waiver of the aisle space requirement			X	
F-4	A description of procedures structures and equipment used at the facility to accomplish the following:				
F-4a	Prevent hazards in unloading operations	X			p. 85
F-4b	Prevent runoff from hazardous waste handling areas	X			p. 85
F-4c	Prevent contamination of water supplies	X			p. 85
F-4d	Mitigate the effects of equipment failure and power outages	X			p. 86
F-4e	Prevent undue exposure of personnel to hazardous waste	X			p. 86
F-5	Prevention of reaction of ignitable, reactive, and incompatible wastes				
F-5a	Demonstration of the specific precautions used to prevent ignition or reaction of ignitable or reactive wastes	X			p. 87

PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
F-5b	Demonstration of the general precautions for handling ignitable or reactive wastes or mixing incompatible wastes	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 87</u>
F-5c	For containers, a detailed description of the facility operating procedures which demonstrate compliance with ignitable or reactive waste requirements and compliance with buffer zone/location/container separation requirements for ignitable or reactive waste	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #8</u>
F-5d	If incompatible wastes are stored, a description of the procedures used to insure compliance with the regulations for incompatible waste/material storage in the same container(s)	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #9</u>
F-5e	For tanks, a description of operational procedures for handling and storage of ignitable or reactive wastes, including the use of buffer zones	<u>          </u>	<u>          </u>	<u>X</u>	<u>          </u>
F-5f	If incompatible wastes are stored, a description of the procedures used to insure compliance with the regulations for incompatible waste/material storage in the same tank(s)	<u>          </u>	<u>          </u>	<u>X</u>	<u>          </u>
F-5g	For waste piles, a detailed description of the facility operating procedures which demonstrate compliance with ignitable or reactive waste requirements	<u>          </u>	<u>          </u>	<u>X</u>	<u>          </u>
F-5h	Description of efforts to separate hazardous waste that is incompatible with any waste or material stored nearby, including the design specifications of any dike, berm, wall, or other device used to separate the materials	<u>          </u>	<u>          </u>	<u>X</u>	<u>          </u>
<b>G. CONTINGENCY PLAN</b>					
	A copy of the contingency plan or amended SPCC plan	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 50</u>
G-1	A general description of the facility	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 50-55</u>
G-2	A list of emergency coordinator's names and phone numbers	<u>          </u>	<u>X</u>	<u>          </u>	<u>p. 59-60, Comment #10</u>
G-3	A list of criteria for implementation of the plan	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #11</u>
G-4	A description of emergency response procedures for spills, fires, and explosions	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 67-71</u>
G-5	A description of emergency equipment including location and capabilities	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #12</u>
G-6	A description of coordination agreements with police and fire departments, hospitals, contractors and state and local emergency response teams	<u>          </u>	<u>X</u>	<u>          </u>	<u>p. 59, Comment #13</u>

PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
G-7	A copy of the evacuation plan	<u>X</u>	<u>      </u>	<u>      </u>	<u>p. 72-83</u>
G-8	A description of provisions for submittal of required reports	<u>      </u>	<u>X</u>	<u>      </u>	<u>Comment #14</u>
H.	PERSONNEL TRAINING				
	Description of the introductory and continuing training programs	<u>      </u>	<u>X</u>	<u>      </u>	<u>      </u>
H-1	An outline of the training program which should briefly describe:				
H-1a	Job titles, duties, and name of each employee receiving training	<u>X</u>	<u>      </u>	<u>      </u>	<u>p. 91-96</u>
H-1b	Content, frequency, and technique used in both introductory and continuing training for each employee	<u>      </u>	<u>X</u>	<u>      </u>	<u>Comment #15</u>
H-1c	Training director's qualifications	<u>      </u>	<u>X</u>	<u>      </u>	<u>Comment #15</u>
H-1d	Relevance of training to job position	<u>      </u>	<u>X</u>	<u>      </u>	<u>Comment #15</u>
H-1f	Training for emergency response	<u>      </u>	<u>X</u>	<u>      </u>	<u>Comment #15</u>
H-2	Provisions for implementing the training program	<u>      </u>	<u>X</u>	<u>      </u>	<u>Comment #15</u>
I.	CLOSURE REQUIREMENTS				
I-1	A copy of the closure plan, including the following:				
	° Schedule for closure	<u>      </u>	<u>X</u>	<u>      </u>	<u>p. 106-107</u>
	° Description of decontamination or disposal of equipment	<u>X</u>	<u>      </u>	<u>      </u>	<u>p. 103</u>
	° Closure procedures for containers, tanks, surface impoundments, waste piles and incinerators, as applicable	<u>X</u>	<u>      </u>	<u>      </u>	<u>p. 103-105</u>
	° Maximum waste inventory	<u>X</u>	<u>      </u>	<u>      </u>	<u>p. 103</u>
I-1a	If applicable, a description of partial closure including partial closure activities	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
I-1b	A description of final closure activities and how these will be conducted according to the regulations	<u>X</u>	<u>      </u>	<u>      </u>	<u>p. 101-102</u>
I-1c	A description of the maximum waste inventory in storage and treatment at any time during the life of the facility	<u>X</u>	<u>      </u>	<u>      </u>	<u>p. 103</u>

PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
I-1d	A description of how closure minimizes the need for post-closure maintenance and minimizes the release of wastes	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 102</u>
I-1e	An estimate of the schedule for final closure, including the expected year of closure and the total time required for closure activities	<u>          </u>	<u>X</u>	<u>          </u>	<u>Comment #16, p. 106-107</u>
I-1f	A description of procedures for the disposal or decontamination of equipment	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 103-104</u>
I-1g	For storage containers, a demonstration of how at closure all hazardous waste and hazardous waste residues will be removed from the containment system, and how remaining contaminated containers, liners, bases, and soil will be decontaminated or removed	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 103-105</u>
I-1h	For storage tanks, a demonstration of how at closure all hazardous waste and hazardous waste residues will be removed from tanks and associated ancillary equipment and how the area will be decontaminated	<u>          </u>	<u>          </u>	<u>X</u>	<u>                                </u>
I-1i	For waste piles, a demonstration of how at closure all hazardous waste and hazardous waste residues will be removed from the pile and from containment system components, and how the containment system and associated components will be decontaminated or removed	<u>          </u>	<u>          </u>	<u>X</u>	<u>                                </u>
I-2	Post-closure (reserved)	<u>          </u>	<u>          </u>	<u>          </u>	<u>                                </u>
I-3	Notice in deed and notice to land authority (reserved)	<u>          </u>	<u>          </u>	<u>          </u>	<u>                                </u>
I-4	A copy of the closure cost estimate	<u>X</u>	<u>          </u>	<u>          </u>	<u>p. 108</u>
I-5	A copy of the financial assurance mechanism, either:	<u>          </u>	<u>          </u>	<u>          </u>	<u>                                </u>
	* A closure trust fund	<u>          </u>	<u>          </u>	<u>X</u>	<u>Financial Test Mechanism</u>
	* A surety bond	<u>          </u>	<u>          </u>	<u>X</u>	<u>Used</u>
	* A letter of credit	<u>          </u>	<u>          </u>	<u>X</u>	<u>p. 110-116</u>
I-6	A copy of the post-closure estimate (reserved)	<u>          </u>	<u>          </u>	<u>          </u>	<u>                                </u>
I-7	Financial assurance mechanism for post-closure (reserved)	<u>          </u>	<u>          </u>	<u>          </u>	<u>                                </u>

PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
I-8	Liability requirements (reserved)	X			p. 118-123
I-9	Proof of coverage by a state financial mechanism if state has equivalent or greater liability requirements for financial assurance for closure and post-closure care			X	
J.	OTHER FEDERAL LAWS				

COLUMBUS COATED FABRICS  
PERMIT APPLICATION COMMENTS

1. Please include a general description of each waste stream listed on the Part A permit. The description should include the source of the waste, the hazard characteristics, the basis for hazardous designation and chemical and physical analyses of the waste. [40 CFR Parts 122.25(a)(2) and 264.13(a)]
2. A description of the primary containment devices used at the facility including design parameters, dimensions, materials of construction and evaluation of compatibility with wastes stored must be included. [40 CFR Parts 122.25(b)(1)(i)(A), 264.171 and 264.172]
3. Please include a description of container management practices used to ensure that containers are always kept closed during storage and that containers are not handled in a manner that could cause them to leak. [40 CFR Parts 122.25(b)(1)(i)(A) and 264.173]
4. For containers of hazardous waste that do not contain free liquids, documentation must be provided to show that these wastes do not contain free liquids. [40 CFR 122.25(b)(1)(ii)(A)]
5. The application must include an inspection schedule for security devices, monitoring devices, safety, emergency, operating and structural equipment. This schedule must identify the types of problems to be looked for during inspection and the frequency of inspection. [40 CFR Parts 122.25(a)(5), 264.15 and 264.33]
6. Please include an inspection schedule for the container storage area. This should include problems to be looked for and indicate that inspections are completed on a weekly basis. Also, please describe methods used to detect leaking containers. [40 CFR 264.179]
7. The inspection log must include the time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs made. The inspection log submitted with this application appears to be primarily a drum (waste) inventory and not readily applicable as an inspection log. [40 CFR 264.15(d)]
8. Please include a demonstration that containers of ignitable wastes are stored at least 50 feet from the property line. It is not clear from the facility drawing that the entire hazardous waste storage building is greater than 50 feet from the property line. Please indicate which areas of the hazardous waste storage building are used to store hazardous waste. [40 CFR 122.26(b)(1)(ii) and 264.176]
9. If incompatible wastes are stored at the facility, please include a description of management practices to ensure that incompatible wastes are not placed in the same container and that separate containers of incompatible wastes are separated by the use of the dike, berms, walls or other devices. [40 CFR 122.25(b)(1)(iii) and 264.177]
10. Please include names of designated alternate emergency coordinators. Also, a statement of authorization of the emergency coordinator to commit the necessary resources to implement the contingency plan is required. [40 CFR Parts 264.52(a) and 264.56(b)]
11. A list of criteria for implementation of the contingency plan must be included with the contingency plan. [40 CFR Parts 264.52(a) and 264.56(b)]
12. Please include the location, description and capabilities of emergency equipment. [40 CFR Part 264.52(e)]

COLUMBUS COATED FABRICS  
PERMIT APPLICATION COMMENTS  
PAGE 2

13. Please include evidence and a description of coordination agreements with local police and fire departments and hospitals. [40 CFR 264.52(c) and 264.37]
14. Provisions for submission of reports of emergency incidents within 15 days of occurrence and maintenance of required records must be included with the Part B application. [40 CFR Part 264.56(j)]
15. The outline of the personnel training program must include:
  - a) a description of the content, frequency and technique used in introductory and continuing training;
  - b) demonstration that the training director is trained in hazardous waste;
  - c) demonstration that training is relevant to job position;
  - d) demonstration that facility personnel are familiar with emergency procedures, emergency equipment and emergency systems; and
  - e) indication that training is successfully completed by facility personnel within 6 months of employment or assignment to a facility or transfer to a new position at the facility. [40 CFR Parts 122.25(a)(12), 264.16(c), 264.16(d)(3), 264.16(a)(2), 264.16(1), 264.16(a)(3), 264.16(d)(4) and 264.16(b)]
16. Please include an estimated year of closure and an estimate of the time period which will be required for each closure step. [40 CFR 122.25(a)(13), 264.113(a) and 264.113(b)]

OCT 22 1982

Mr. Paul Flanigan  
DHMM - OEPA  
361 East Broad Street  
P.O. Box 1049  
Columbus, Ohio 43216

SHW-TUB

RE: Hazardous Waste Part B Permit Application

Facility EPA ID #: OHD004294351  
Facility Name: Columbus Coated Fabrics  
Facility Address: Columbus, Ohio

Dear Mr. Flanigan:

Enclosed is a copy of the Part B application and correspondence for the above referenced facility.

Your agency is requested to perform a completeness check of the application, prepare comments, and draft a deficiency letter if appropriate. Please forward the filled-in checklist, review comments, and draft letter to this office by November 15, 1982. This will allow my staff 2 weeks to review the comments and issue the letter before expiration of the allotted 60 days review period.

Please contact Mr. Kathleen Homer, the responsible U.S. EPA person at (312) 886-3718, if you have any questions regarding the application.

Sincerely yours,

William H. Miner, Chief  
Technical, Permits and Compliance Section

Enclosure

bcc: Jodi Traub

SHW-TUB:Homer/fy:10/20/82

041-3

INITIALS  
DATE

TYPIST

*W. H. Miner*  
10/20/82

TES  
CHIEF

VMB  
CHIEF

AHMD  
DIRECTOR

# COLUMBUS COATED FABRICS

Division of  
BORDEN CHEMICAL, BORDEN INC.



September 30, 1982

RCRA Activities  
Part B Permit Application  
USEPA, Region V  
P.O. Box A3587  
Chicago, Illinois 60690-3587

Attached are 3 copies of the RCRA Part B Permit Application.  
These are sent in conformance with your letter of 3/31/82.

If there are any questions please call.

Very truly yours,

William G. Ilg  
Senior Project Engineer  
COLUMBUS COATED FABRICS  
Division of Borden Chemical  
Borden, Inc.

WGI/am

RECEIVED

SEP 30 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

RECEIVED  
10/06/82

COPY 1

Date: 9/30/82  
Revision No. : 0

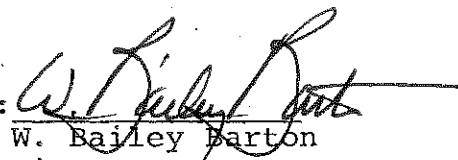
### CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date: \_\_\_\_\_

9-30-82

Signature: \_\_\_\_\_

  
W. Bailey Barton  
Director  
Environmental Affairs



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
RCRA ACTIVITIES

JUL 1 1982

Mr. Wm. Ilg  
Columbus Coated Fabrics  
P.O. Box 208  
Columbus, Ohio 43216

RE: OHD004294351  
Columbus Coated Fabrics  
1280 N. Grant Avenue  
Columbus, Ohio 43201

Dear Mr. Ilg:

To facilitate the processing of hazardous waste permit applications, we are making two additional requirements concerning the format of these applications:

1. Please uniquely number each page of the application including all attachments (maps, specifications, etc.)
2. If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

If you have any questions, please call the person indicated in the Part B request letter. Thank you for your cooperation.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

FILE



MAY 20 1982

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
5HW-TUB

Mr. Wm. Ilg  
Columbus Coated Fabrics  
P.O. Box 208  
Columbus, Ohio 43216

044 D004294 251

*Borden INC*

RE: EPA ID# OHD004293451  
Columbus Coated Fabrics  
Columbus, Ohio 43216

Dear Mr. Ilg:

Recently, we requested you to submit a Part B application for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program.

In an attempt to coordinate the review of your application with the Ohio Environmental Protection Agency (OEPA), and striving for a simultaneous issuance or denial of Federal and State hazardous waste facility permits, we urge you to submit three copies of your Part B to OEPA at the same time it is submitted to this Agency. The mailing address for OEPA is:

Ohio Environmental Protection Agency  
Division of Hazardous Materials Management  
361 East Broad Street Box 1049  
Columbus, Ohio 43216

Your direct submittal is necessary to allow OEPA to begin processing under Ohio state law. If you send copies directly to OEPA, you need send only three (rather than four) copies to USEPA.

If you have questions concerning the Ohio permitting process, please contact Mr. Paul Flanigan of OEPA at (614) 462-6303, or Mr. Bob Fragale of the Ohio Hazardous Waste Facility Approval Board at (614) 462-6981. If you have questions concerning the Federal permit process, please contact your permit-writer in this Agency, or Ms. Kathleen Homer, State Implementation Officer for Ohio, at (312) 886-6148.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

cc: Paul Flanigan - OEPA  
Bob Fragale - HWFAB

040004294351

BORDEN INC

180 EAST BROAD STREET, COLUMBUS, OHIO 43215

Contact & Mailing Add. changed  
4-28-82 MGP



April 13, 1982

THOMAS R. HEATON  
ENVIRONMENTAL SPECIALIST  
ENVIRONMENTAL AFFAIRS

orig to PA  
copies to notif files

RECEIVED

APR 22 1982

USEPA, Region V  
RCRA Activities  
P.O. Box 17861  
Chicago, IL 60680

WASTE MANAGEMENT BRANCH  
EPA REGION V

Dear Sirs:

Enclosed herewith is a list of the Borden Inc. facilities for which permit applications to treat, store, or dispose of hazardous waste were submitted to your office on November 18, 1980. Directing your attention to the "reverse" side of Form 1, General of these applications, Borden Chemical's owner/operator representative, Mr. Robert W. Gutheil, discharges the direct responsibility for environmental concerns to Borden's Director of Corporate Environmental Affairs.

Therefore, to avoid any potential for a correspondence from your agency to be misdirected, please send future correspondence which would normally go to the owner/operator representative to:

W. Bailey Barton  
Director, Environmental Affairs  
Borden, Inc.  
180 E. Broad St.  
Columbus, Ohio 43215

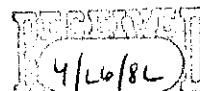
Thank you for your cooperation in this matter.

Sincerely,

Thomas R. Heaton

Thomas R. Heaton

TRH/slw



PERMIT APPLICATION FOR A FACILITY TO  
TREAT, STORE OR DISPOSE OF  
HAZARDOUS WASTES  
PART A, FORMS 1 AND 3

SUBMISSIONS TO US EPA REGION V  
November 18, 1980

FACILITY

CITY

STATE

Smith-Douglass  
Smith-Douglass  
Smith-Douglass  
Borden Chemical, Adhesives &  
Chemicals Div.  
Columbus Coated Fabrics Div.  
Borden Chemical, Printing Ink Div.  
Borden Chemical, Printing Ink Div.  
Borden Chemical, Adhesives &  
Chemicals Div.  
Borden Chemical, Printing Ink Div.  
Borden Chemical, Adhesives &  
Chemicals Div.  
Borden Chemical, Printing Ink Div.  
Borden Chemical, Thermoplastics Div.  
Borden Chemical, Printing Ink Div.

Streator  
Hampshire  
Saginaw  
Sheboygan  
  
Columbus  
Menasha  
Whitehouse  
Cicero  
  
Portage  
Delaware  
  
St. Charles  
Illioopolis  
Woodlawn

gTTSD PA  
IL 12D003178175  
IL12D005468822 gTTSDPA  
MIM10068824655 gTTSDPA  
WIW10023540263 gTTSDPA  
  
OH04D004294351 gTTSDPA  
WIW10099139933 gTTSDPA  
OH04D005043746 gTTSDPA  
IL12D074367434 gTTSDPA  
  
MIM10092950195 PA  
OH04D004297839 gTTSDPA  
  
IL12D064017946 gTTSDPA  
IL12D005158548 gTTSDPA  
OH04D0068932011 gTTSDPA

PART B DOCKET LOG

Please print

Facility Borden, Inc., Col. Coated Fabrics

I.D. # 040 004 294 351

Item No.	Item Date	Description	Item Filed*
041-49	6/22/84	Comment: W. C. Myers to M. Ohm	Sec 6
041-50	7/5/84	4 cover letters for PSA's	11
041-51	7/13/84	News Release	11
041-52	7/20/84	Significant Action Memo Prior to Hearing	11
041-53	7/25/84	Comment: Columbus Health Department to record	Sec 6
041-54	7/27/84	Sig. Action Memo Subsequent to Hearing	11
041-55	7/27/84	Comment: Barbara Covert to M. Ohm	11
041-56	8/2/84	Comment: J. Gorby to M. Ohm	11
041-57	8/4/84	Comment: S. & D. Mettle to M. Ohm	11
041-58	8/26/84	Comment: R. P. Zelizer to M. Ohm	11
041-59	6/1/84	Memo: M. Klepitsch to C. Christenson	Sec 6
041-60	9/12/84	Phone Memo: C. Christenson to W. I/g	Sec 6
041-61	7/26/84	Newspaper clipping (Listed a, b, c, d)	Sec 6
041-62	6/13/84	4 Constituency Letters From K. J. Klepitsch	Sec 6
042-63		Final Permit	Sec 5
042-64	9/17/84	Memo: Christenson to Klepitsch	Sec 4
042-65	9/25/84	Memo: Grimes to Grade	Sec 4
042-66	9/27/84	Final Permit Sign-Off	Sec 4
042-67	9/27/84	Responsiveness Summary	Sec 6
042-68	9/27/84	Summary of Responses to Notice of Final Permit Decision	Sec 6
042-69	10/3/84	Final Report of Mailing w/ mailing list	Sec 6

\*Folder 1 is organized by sections.

PART B DOCKET LOG

Please print

Facility Borden, Inc., Columbus Coated Fabrics  
 I.D. # 04D 004 294 351

<u>Item No.</u>	<u>Item Date</u>	<u>Description</u>	<u>Item Filed*</u>
041-26		Public Notice	Sec 6
041-27		Hazardous Waste Management <sup>Draft</sup> Permit	Folder 2
041-28		FACT SHEET	" "
041-29	5/30/84	Public Voucher for Advertising (w/confirmation attached)	Sec 6
041-30	5/31/84	Procurement for Ct. Reporter	"
041-31	6/13/84	Order for Ct Reporter	"
041-32	5/31/84	Procurement for Radio Broadcast (WBNS)	"
041-33		Paid Public Broadcast	"
041-34	6/13/84	Order for Radio Broadcast (WBNS)	"
041-35	6/13/84	Order for Radio Broadcast (WRFD)	"
041-36	5/31/84	Procurement for Radio Broadcast (WRFD)	"
041-37	6/24/84	Verification of Broadcast (WBNS)	"
041-38		Public Service Announcement	"
041-39	6/7/84	Letter to Columbus Library	"
041-40	5/31/84	Procurement for Public Hearing Facility	"
041-41	6/29/84	Memo: M. Ohm to File	"
041-42	7/10/84	Memo M. Ohm to Dave Urbanski	"
041-43	6/14/84	Certificate of Mailing w/ mailing list	"
041-44		Registration Cards	"
041-45		Transcript	"
041-46		HEARING OFFICER'S SPEECH	"
041-47		Hearing Checklist	"
041-48	6/5/84	Letter: M. Ohm to M. Pompili	"

\*Folder 1 is organized by sections.

## PART B DOCKET LOG

Please print

Facility Borden Inc Columbus Coated FabricsI.D. # 0# D004294351

Item No.	Item Date	Description	Item Filed*
041-1		Log	Sec 1
041-2	10/6/82	(app. in Blue Binder Folder 2, Cover Letter Sec. 2)	Folder 2
041-3	10/22/82	Letter w/attach: W.H. Miner to Paul Flanigan, OHPA transmitting Part B	Sec 2
041-4	11/15/82	Letter w/attach: W.H. Miner to Paul Flanigan, OHPA K. Horner, STU#2, WMP	Sec 2
041-5	12/1/82	Letter w/attach: W.H. Miner to W.G. Dig. Columbus Coated Fabrics, attach = 041-4	Sec. 2
041-6	10/11/82	Letter: RAIS to W.H. Miner, transmitting Part B for review	Sec. 3
041-7	2/4/83	Subsequent to 041-6, Blue Binder Folder 2 to W.H. Miner, W.H. Dig. (with a Binder Sec 2)	Folder 2 & Sec 2
041-8	2/10/83	Letter: RAIS to D. Baransek subsequent to 041-6	Sec 2
041-11	4/12/83	Letter from P. Flanigan to W.H. Dig. (w/attach)	Sec. 2
041-12	5/12/83	Subsequent to 041-11, W.H. Dig. to K. Horner (with a Binder Sec 2)	Folder 2
041-13	5/17/83	Letter: K.H. to D. Baransek transmitting 041-12	Sec. 2
041-9	3/02/83	Letter: W.H. Miner to W.H. Dig. (w/attach)	Sec. 2
041-10	3/02/83	Letter: W.H. Miner to T. Laxman, requesting drawings and a permit by 5/6/83.	Sec. 2
041-14	5/23/83	Letter: T. Laxman to W.H. Miner, requesting drawings and a permit by 5/6/83.	Sec. 2
041-15	5/27/83	Letter: T. Laxman to W.H. Miner, requesting drawings and a permit by 5/6/83.	Sec. 2
041-16	6/6/83	Letter: T. Laxman to W.H. Miner, requesting drawings and a permit by 5/6/83.	Sec. 2
041-17	7/1/83	Letter: T. Laxman to W.H. Miner, requesting drawings and a permit by 5/6/83.	Sec. 2
041-18	7/26/83	Letter: T. Laxman to W.H. Miner, requesting drawings and a permit by 5/6/83.	Sec. 2
041-19	10/19/83	Letter: T. Laxman to W.H. Miner, requesting drawings and a permit by 5/6/83.	Sec. 2
041-20	12/20/83	Letter: T. Laxman to W.H. Miner, requesting drawings and a permit by 5/6/83.	Sec. 2
041-21	12/15/83	Letter, w/attach: T. Laxman to J. May, Jr.	Sec. 2
041-22	2/3/84	Letter: C. Laxman to J. May, Jr.	Sec. 4
041-23	4/17/84	Letter: C. Laxman to J. May, Jr. (w/attach)	Sec. 4
041-24	5/9/84	Letter: W. Horner to J. May, Jr.	Sec. 4
041-25	5/17/84	Draft Permit for 041-24	Sec. 4

\*Folder 1 is arranged by sections.